

**A.2 Part A/
Interim Status**



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST.

CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

RCRA ACTIVITIES

*Bohannon Electric
3500 W. Endley PL
Chicago IL 60618*

RE: EPA ID #: 14D005001-24

In response to your request of 8-14-86 the following information

has been updated: *last slot out contact*

- Com 1 chg.

- Description of Hazardous Waste

If you have any questions, please contact Spencer Kridder at 312-646-173

Sincerely,

Arthur S. Kawatachi
Information Unit
Program Management Section

cc: State Agency
File



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:
RCRA ACTIVITIES

MAR 23 1982

Ralph Juchcinski
2500 W. Bradley Place
Chicago, IL 60618

RE: Interim Status Acknowledgement USEPA ID No. ILD 005 069 224
FACILITY NAME: Bodine Electric Company

Dear Mr. Juchcinski:


This is to acknowledge that the U.S. Environmental Protection Agency (USEPA) has completed processing your Part A Hazardous Waste Permit Application. It is the opinion of this office that the information submitted is complete and that you, as an owner or operator of a hazardous waste management facility, have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. However, should USEPA obtain information which indicates that your application was incomplete or inaccurate, you may be requested to provide further documentation of your claim for Interim Status. Our opinion will be reevaluated on the basis of this information.

As an owner or operator of a hazardous waste management facility, you are required to comply with the interim status standards as prescribed in 40 CFR Parts 122 and 265, or with State rules and regulations in those States which have been authorized under Section 3006 of RCRA. In addition, you are reminded that operating under interim status does not relieve you from the need to comply with all applicable State and local requirements.

The printout enclosed with this letter identifies the limit(s) of the process design capacities your facility may use during the interim status period. This information was obtained from your Part A Permit application. If you wish to handle new wastes, to change processes, to increase the design capacity of existing processes, or to change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 122.22 and 122.23.

As stated in the first paragraph of this letter, you have met the requirements of 40 CFR Part 122.23; your facility may operate under interim status until such time as a permit is issued or denied. This will be preceded by a request from this office or the State (if authorized) for Part B of your application. Please contact Arthur Kawatachi of my staff at (312) 886-7449, if you have any questions concerning this letter or the enclosure.

Sincerely yours,


Karl J. Klepitsch, Jr., Chief
Waste Management Branch

Enclosure

OK
Ref Stone
3-19-82

FACILITY NAME

BODINE ELECTRIC COMPANY

EPA ID NUMBER

ILD005069224

FACILITY OPERATOR

BODINE ELECTRIC COMPANY

FACILITY OWNER

BODINE ELECTRIC COMPANY

FACILITY LOCATION

2500 W BRADLEY PL
CHICAGO

IL 60618

PROCESS CODE

S01

DESIGN CAPACITY

1100.00000

UNIT OF MEASURE

G

OK

*****KEY*****				
PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE	* UNIT OF MEASURE	CODE
STORAGE:				
CONTAINER	S01	G OR L	* GALLONS	G
TANK	S02	G OR L	* LITERS	L
WASTE PILE	S03	Y OR C	* CUBIC YARDS	Y
SURFACE IMPOUNDMENT	S04	G OR L	* CUBIC METERS	C
DISPOSAL:			* GALLONS PER DAY	U
			* LITERS PER DAY	V
			* TONS PER HOUR	D
			* METRIC TONS\HOUR	W
INJECTION WELL	D79	G, L, U, OR V	* GALLONS\HOUR	E
LANDFILL	D80	A OR F	* LITERS\HOUR	H
LAND APPLICATION	D81	B OR Q	* ACRE-FEET	A
OCEAN DISPOSAL	D82	U OR V	* HECTARE-METER	F
SURFACE IMPOUNDMENT	D83	G OR L	* ACRES	B
TREATMENT:			* HECTARES	Q
			* POUNDS\HOUR	J
TANK	T01	U OR V	* KILOGRAMS\HOUR	R
SURFACE IMPOUNDMENT	T02	U OR V	* TONS PER DAY	N
INCINERATOR	T03	D, W, E, OR H	* METRIC TONS\DAY	S
OTHER	T04	J, R, N, S, U, V	*	



**ACKNOWLEDGEMENT OF NOTIFICATION
OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)**

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

ILD005069224

REACKNOWLEDGEMENT

BODINE ELECTRIC COMPANY
2500 W BRADLEY PL
CHICAGO

IL 60618

INSTALLATION ADDRESS

2500 W BRADLEY PL
CHICAGO

IL 60618



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 5
RCRA ACTIVITIES
P.O. BOX A3587
CHICAGO, ILLINOIS 60690

JUN 19 1985

5HS-JCK-13

Gene Howard
Plant Engineer
Bodine Electric Company
2500 W. Bradley Place
Chicago, Illinois 60618

RE: Withdrawal of Part A
(Insufficient Information)
FACILITY NAME: Bodine Electric Company
U.S. EPA ID NO.: ILD 005069224

Dear Mr. Howard:

This is to acknowledge receipt of your June 7, 1985 letter requesting withdrawal of your Part A Hazardous Waste Permit Application. Your request did not contain sufficient information to enable this office to concur with your determination. Your request must contain a detailed explanation why the Application should be withdrawn. Also, if at any time since November 19, 1980, your operation included treatment, storage, or disposal of hazardous waste subject to 40 CFR 265, a closure plan must be filed with the withdrawal request. Requirements for closure are found in 40 CFR Part 265, Subpart G (enclosed).

If no response is received in this office within 30 days, we will assume your facility requires a Permit. Accordingly, we will continue to process your Application.

Please contact the Authorization and Information Section at (312) 886-6148 for assistance, if you have any questions. Please refer to "Withdrawal of Part A (Insufficient Information)," in all correspondence on this matter.

Sincerely,

David A. Stringham
Acting Chief, Solid Waste Branch

Enclosure

cc: John Hojnar
Senior Vice President



2500 W. BRADLEY PLACE, CHICAGO, ILLINOIS 60618 AREA CODE 312-478-3515 TELEX 25-3646

June 7, 1985

Mr. David Stringham
RCRA Activities
Region V
P.O. Box A3587
Chicago, IL 60690-3587

RECEIVED

JUN 13 1985

SWD-AIS
U.S. EPA, REGION V

Dear Mr. David Stringham:

ILD 005669224, E, TSD, PA

In our efforts to comply with the U.S. EPA requirements governing hazardous waste disposal, we inadvertently misfiled Part "A" of the RCRA treatment, storage, and/or disposal (TSD) facility permit application.

We do not want to be a TSDF nor do we ever intend to use it in the future. We are a small waste generator and ship all of our waste within (90) days. All of our waste is stored in (55) gal. drums.

We want to withdraw from the system as a TSDF and be classified and permitted as a hazardous waste generator only. Your help in this matter is greatly appreciated.

Yours truly,

Gene Howard

Gene Howard
Plant Engineer

John Hojnar

John Hojnar
Senior Vice President-
Finance and Administration
and Secretary-Treasurer

I.D. - FOR OFFICIAL USE ONLY														
S	1	2	3	4	5	6	7	8	9	10	11	12	T/A	C
W	I	L	D	0	0	5	0	6	9	2	2	4	21	
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15

IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
F 0 0 1	F 0 0 2	F 0 0 3	F 0 1 7		
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
7	8	9	10	11	12
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
19	20	21	22	23	24
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
25	26	27	28	29	30
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
U 2 3 9	U 2 2 8	U 1 5 9	U 2 1 0	U 0 8 0	
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
37	38	39	40	41	42
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
43	44	45	46	47	48
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☒ 1. IGNITABLE
(D001)


☐ 2. CORROSIVE
(D002)

☐ 3. REACTIVE
(D003)

☒ 4. TOXIC
(D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE	NAME & OFFICIAL TITLE (type or print)	DATE SIGNED
	E. J. Liebewein Mgr. of Manufacturing	8-14-80

ILD00-506-1224



BODINE
ELECTRIC
COMPANY

2500 W. BRADLEY PLACE, CHICAGO, ILLINOIS 60618 AREA CODE 312-478-3515 TELEX 25-3646

ILD005069224 PA

July 30, 1980

EPA Region V
RCRA Activities
P.O. Box 7861
Chicago, IL. 60680

Attn: Mr. Y.J. Kim

Gentlemen:

Reference is the regulations published by EPA in the May 19, 1980 Federal Register and requirements to submit notification form no later than August 18, 1980.

We have been unable to establish a telephone contact due to your busy lines and therefore are using this letter to request an extension for notification. Due to vacation conflicts both with our personnel and suppliers, we require additional time to identify hazardous wastes and the quantity generated. Our investigation to date indicates that we may be excluded by reason of generating less than 1000 Kg/month.

Please advise if an extension can be granted. Thank you for your co-operation.

Very truly yours,

Miles L. Hlavin

Manager of Purchasing

MLH:a

*Follow up with Kim
on 8/8/80
Re: Extension
Told them No Extension*

AUG 05 1980

Example
AUG 15 1980



FORM 1 GENERAL	ENVIRONMENTAL PROTECTION AGENCY GENERAL INFORMATION Consolidated Permits Program <i>(Read the "General Instructions" before starting.)</i>	I. EPA I.D. NUMBER <div style="border: 1px solid black; padding: 2px;"> IL D 0 0 5 0 6 9 2 2 4 </div>
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LABEL ITEMS II. EPA I.D. NUMBER III. FACILITY NAME V. FACILITY MAILING ADDRESS VI. FACILITY LOCATION	BODINE ELECTRIC COMPANY** 2500 W BRADLEY PL CHICAGO, IL 60618 2500 W BRADLEY PL CHICAGO, IL 60618
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GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK 'X'			SPECIFIC QUESTIONS	MARK 'X'		
	YES	NO	FORM ATTACHED		YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)		X		D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X			F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY

C	1	SKIP	
---	---	------	--

IV. FACILITY CONTACT

A. NAME & TITLE (last, first, & title)		B. PHONE (area code & no.)	
C	JUCHCINSKI RALPH PLANT ENGR	312	478 3515

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX			
C	3	2500 W BRADLEY PL.	
B. CITY OR TOWN		C. STATE	D. ZIP CODE
C	CHICAGO	IL	60618

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER			
C	5	2500 W BRADLEY PL.	
B. COUNTY NAME			
COOK			
C. CITY OR TOWN		D. STATE	E. ZIP CODE
C	CHICAGO	IL	60618
		F. COUNTY CODE (if known)	
		031	

VII. SIC CODES (4-digit, in order of priority)

A. FIRST

C	7	3	6	2	1	(specify)
15	16	17	18	19		

 MFG. OF ELECTRIC MOTORS

B. SECOND

C	7	(specify)
15	16	19

C. THIRD

C	7	(specify)
15	16	19

D. FOURTH

C	7	(specify)
15	16	19

VIII. OPERATOR INFORMATION

A. NAME

C	8	B	O	D	I	N	E	E	L	E	C	T	R	I	C	C	O	M	P	A	N	Y
15	16																					

B. Is the name listed in Item VIII-A also the owner?

☒ YES ☐ NO
66

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)

 F = FEDERAL
 S = STATE
 P = PRIVATE

 M = PUBLIC (other than federal or state)
 O = OTHER (specify)

P	(specify)
50	

D. PHONE (area code & no.)

C	3	1	2	4	7	8	3	5	1	5
A	15	16	18	19	21	22	23	24	25	26

E. STREET OR P.O. BOX

2	5	0	0	W	B	R	A	D	L	E	Y	P	L
26	27	28	29	30	31	32	33	34	35	36	37	38	

F. CITY OR TOWN

C	B	C	H	I	C	A	G	O
15	16	17	18	19	20	21	22	23

G. STATE

IL
40

H. ZIP CODE

6	0	6	1	8
41	42	43	44	45

IX. INDIAN LAND

Is the facility located on Indian lands?

☐ YES ☒ NO
52

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)

C	T	I
9	N	
15	16	18

D. PSD (Air Emissions from Proposed Sources)

C	T	I
9	P	
15	16	18

B. UIC (Underground Injection of Fluids)

C	T	I
9	U	
15	16	18

E. OTHER (specify)

C	T	I
9		
15	16	18

 (specify)

C. RCRA (Hazardous Wastes)

C	T	I
9	R	
15	16	18

E. OTHER (specify)

C	T	I
9		
15	16	18

 (specify)

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

F9: A/50

XII. NATURE OF BUSINESS (provide a brief description)

MANUFACTURER OF FRACTIONAL HORSEPOWER ELECTRIC MOTORS.

F9: A/51

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)

 PAUL J. BODINE, JR. - VICE
 PRESIDENT-ADMINISTRATION &
 TREASURER

B. SIGNATURE

C. DATE SIGNED

11-17-80

COMMENTS FOR OFFICIAL USE ONLY

C	
C	
15	16

55

FORM 3 RCRA		ENVIRONMENTAL PROTECTION AGENCY HAZARDOUS WASTE PERMIT APPLICATION Consolidated Permits Program (This information is required under Section 3005 of RCRA.)	I. EPA I.D. NUMBER											
			F I L D 0 0 5 0 6 9 2 2 4 3 1											

FOR OFFICIAL USE ONLY		COMMENTS
APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	
23	24	29

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION (place an "X" below and provide the appropriate date)

☒ 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)

☐ 2. NEW FACILITY (Complete item below.)

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)

YR.	MO.	DAY
8	5	6
73	74	75

B. REVISED APPLICATION (place an "X" below and complete Item I above)

☐ 1. FACILITY HAS INTERIM STATUS

☐ 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES - CODES AND DESIGN CAPACITIES

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

B. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.

1. AMOUNT - Enter the amount.
2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS
OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or inciner- ators. Describe the processes in the space provided; Item III-C.)		

UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G
LITERS	L
CUBIC YARDS	Y
CUBIC METERS	C
GALLONS PER DAY	U
LITERS PER DAY	V
TONS PER HOUR	D
METRIC TONS PER HOUR	W
GALLONS PER HOUR	E
LITERS PER HOUR	H

UNIT OF MEASURE	UNIT OF MEASURE CODE
ACRE-FEET	A
HECTARE-METER	F
ACRES	B
HECTARES	Q

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

C DUP												T/A	C																	
												3	1																	
1	2											13	14	15																
LINE NUMBER	A. PRO- CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY										FOR OFFICIAL USE ONLY	LINE NUMBER	A. PRO- CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY										FOR OFFICIAL USE ONLY					
		1. AMOUNT (specify)					2. UNIT OF MEA- SURE (enter code)								1. AMOUNT					2. UNIT OF MEA- SURE (enter code)										
X-1	S	0	2	600					G						5															
X-2	T	0	3	20					E						6															
1	S	0	1	11000000					G						7															
2															8															
3															9															
4															10															
												13	14	15											27	28	29	30	31	32

III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. **EPA HAZARDOUS WASTE NUMBER** — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. **ESTIMATED ANNUAL QUANTITY** — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. **UNIT OF MEASURE** — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE CODE
POUNDS..... P
TONS..... T

METRIC UNIT OF MEASURE CODE
KILOGRAMS..... K
METRIC TONS..... M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES**1. PROCESS CODES:**

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARDOUS WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

Continued from page 2.

NOTE: Photocopy this page before completing it. have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)													FOR OFFICIAL USE ONLY												
W I L D 00506922431													W DUP 32 DUP												
DESCRIPTION OF HAZARDOUS WASTES (continued)																									
LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES																					
				1. PROCESS CODES (enter)																					
				2. PROCESS DESCRIPTION (if a code is not entered in D(1))																					
1	F 001	2640000	P	S 01																					
2	U 228																								
3	F 002	4400000	P	S 01																					
3	U 080																								
5	F 003	216000000	P	S 01																					
5	U 239																								
7	F 017	216000000	P	S 01																					
7	F 018																								
9	F 005	4500000	P	S 01																					
9	U 159																								
11	F 001	4500000	P	S 01																					
11	U 210																								
13	D 001	216000000	P	S 01																					
14	D 006	108000000	P	S 01																					
14	D 008																								
16																									
17																									
18																									
19																									
20																									
21																									
22																									
23																									
24																									
25																									
26																									

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)															
S														T/A	C
F	I	L	D	0	0	5	0	6	9	2	2	4		3	6
1	2					-							13	12	11

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

F6: B/55

All existing facilities must include photographs (*aerial or ground-level*) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (*see instructions for more detail*).

Storage, F6: $\frac{N}{56}$

LATITUDE (degrees, minutes, & seconds)

4	1	5	3	4	5	\emptyset
65	66	67	68	69	-	71

LONGITUDE (degrees, minutes, & seconds)

8	7	4	1	2	0
---	---	---	---	---	---

X A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER													2. PHONE NO. (area code & no.)																
BODINE ELECTRIC COMPANY													312-478-3515																
3. STREET OR P.O. BOX													4. CITY OR TOWN										5. ST.			6. ZIP CODE			
2500 W. BRADLEY PL.													CHICAGO										IL			60618			

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
PAUL BODINE JR.		11-17-80

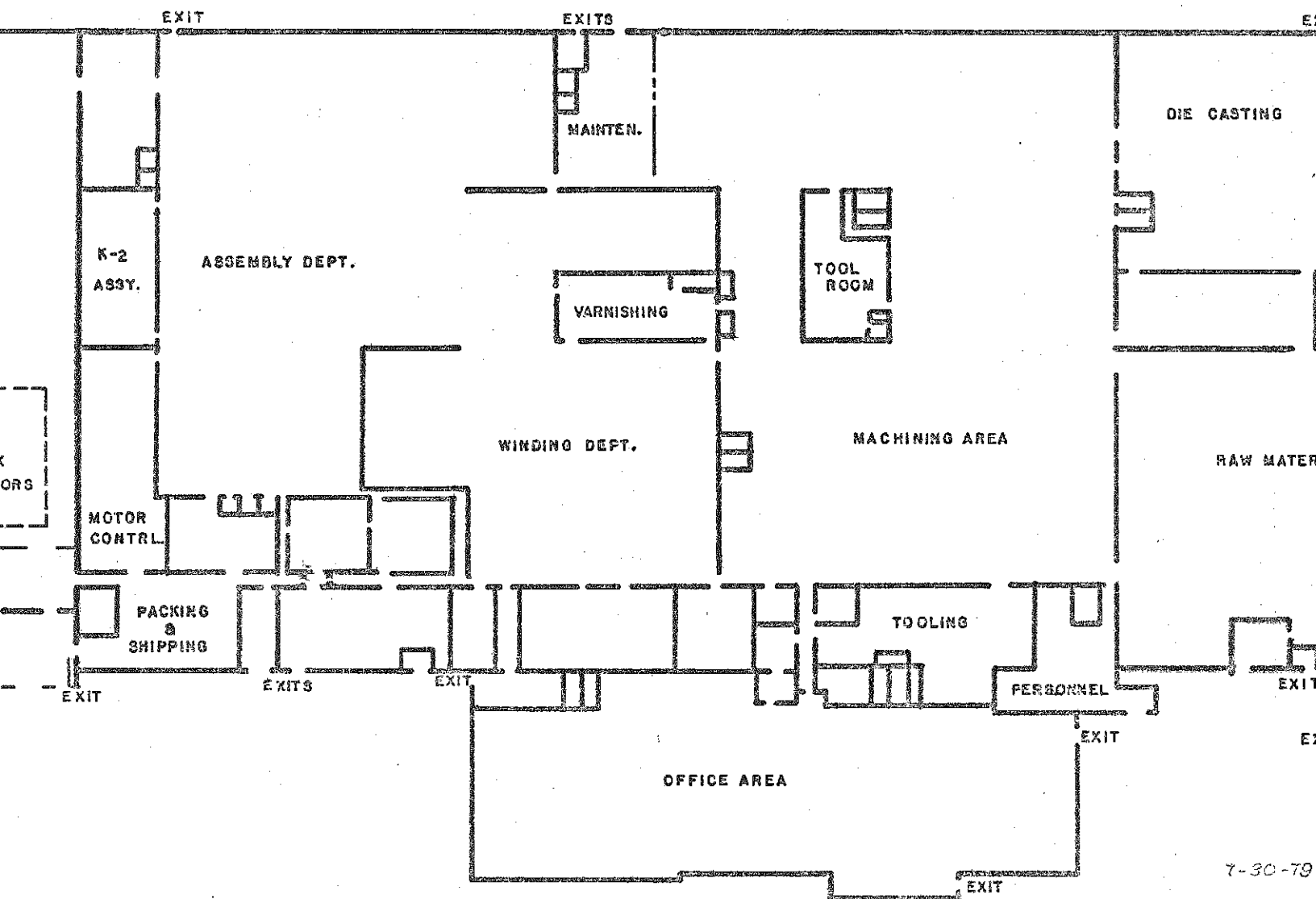
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
-------------------------	--------------	----------------

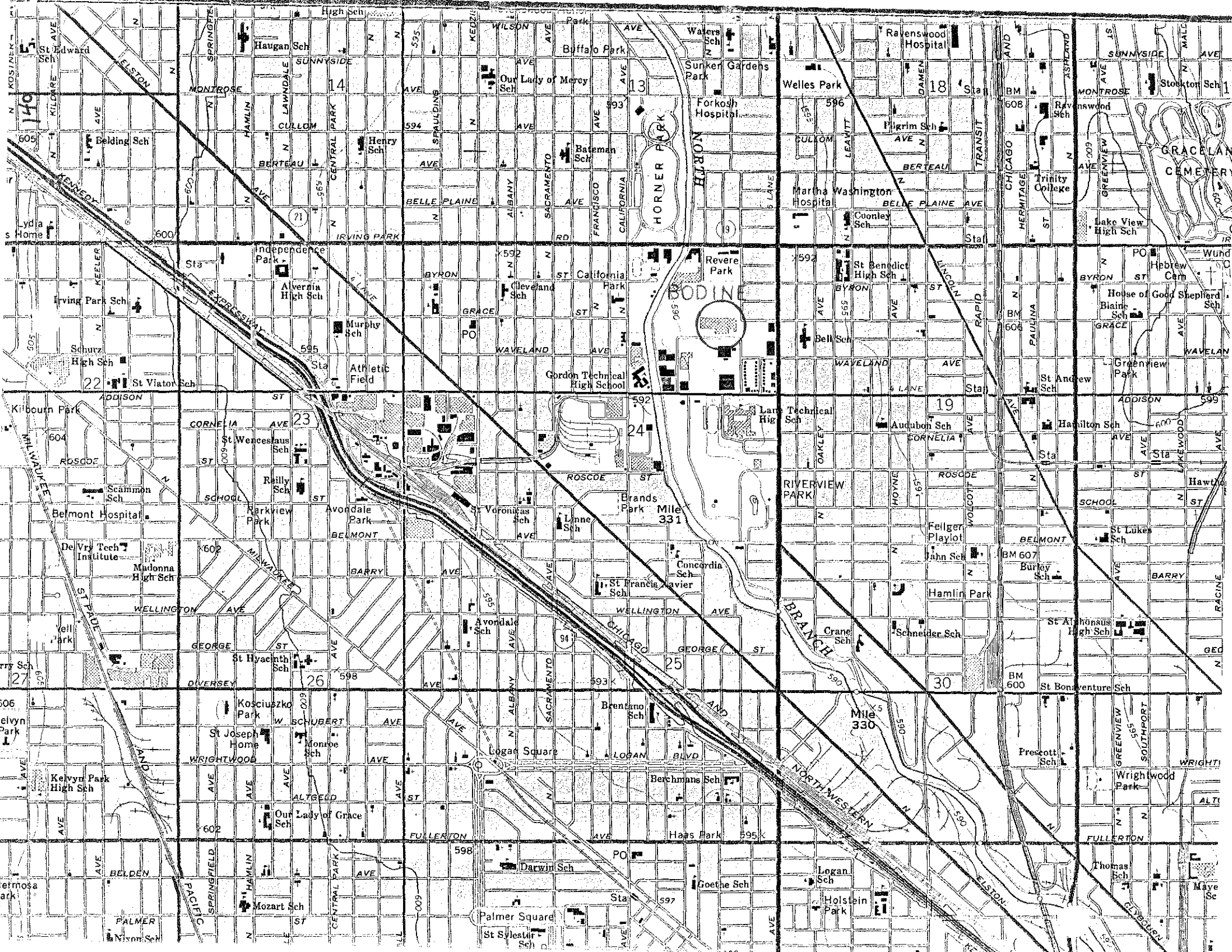
BODINE ELECTRIC COMPANY

SCALE: 1"=80'

PLANT LAYOUT



7-30-79



**A.4 Closure/
Post-Closure**



Lumbermens Mutual Casualty Company • American Motorists Insurance Company
American Manufacturers Mutual Insurance Company • American Protection Insurance Company

20 North Wacker Drive, Chicago, IL 60606 • 312 | 621-8200

March 1, 1983

U. S. Environmental Protection Agency
230 South Dearborn Street
Chicago, Illinois 60604

Gentlemen:

BODINE ELECTRIC COMPANY
2500 WEST BRADLEY PLACE
CHICAGO, ILLINOIS 60618

EPA IDENTIFICATION NUMBER ILD005069224 PA, G, T80, PAS1

This letter is to notify you that policy number 2YM446 332 issued by American Motorists Insurance Company has not been renewed effective March 1, 1983. We are therefore cancelling Hazardous Waste Facility Certificate of Pollution Liability Insurance issued in conjunction with this policy effective March 1, 1983.

Very truly yours,

A handwritten signature in blue ink that reads "Mark D. O'Brien".

Mark D. O'Brien
Selected Accounts Underwriting



RECEIVED
MAR 03 1983

WASTE MANAGEMENT
BRANCH

ILD 005 069 224



Lumbermens Mutual Casualty Company • American Motorists Insurance Company
American Manufacturers Mutual Insurance Company • American Protection Insurance Company

20 North Wacker Drive, Chicago, IL 60606 • 312 | 621-8200

February 15, 1983

U. S. Environmental Protection Agency
230 South Dearborn
Chicago, Illinois 60604

Gentlemen:

BODINE ELECTRIC COMPANY
2500 WEST BRADLEY PLACE
CHICAGO, ILLINOIS 60618

EPA IDENTIFICATION NUMBER ILD005069224

Enclosed is Hazardous Waste Facility Certificate of
Pollution Liability Insurance which we are filing on
behalf of the captioned insured.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Mark D. O'Brien", written over a faint, larger, and less legible signature.

Mark D. O'Brien
Selected Accounts Underwriting

RECEIVED
FEB 17 1983
WASTE MANAGEMENT
BRANCH

AMENDATORY ENDORSEMENT POLLUTION LIABILITY

ILD 005869-224



THE HARTFORD

This endorsement modifies such insurance as is afforded by the provisions of the policy relating to the following
COMPREHENSIVE GENERAL LIABILITY INSURANCE
COMPREHENSIVE — PLUS SPECIAL GENERAL LIABILITY INSURANCE
SMP LIABILITY INSURANCE

Premium for This Endorsement \$ INCL

Part I Separate Limits of Liability Endorsement (Hazardous Waste Facility)

It is agreed that:

1. The limits of liability stated in the Hazardous Waste Facility Pollution Liability Endorsement in Part II apply separately to such insurance as is afforded by the policy in connection with the insured's obligation to demonstrate financial responsibility at the facilities described therein.
2. Such limits of liability apply collectively to all such facilities (and not separately to each) and are in lieu of and not in addition to any other limits of liability stated elsewhere in the policy.
3. The "each occurrence" limit applies to all bodily injury and all property damage arising out of a single occurrence.
4. The annual "aggregate" limit applies to all damages because of all bodily injury and all property damage which occurs during the policy period.
5. For the purpose of determining the limit of the company's liability, all bodily injury and property damage arising out of a sudden and accidental discharge, dispersal, release or escape of irritants, contaminants or pollutants, including all bodily injury and property damage arising out of all subsequent exposure of persons or property to such substances, shall be considered as arising out of a single occurrence.
6. Part I of this endorsement shall be cancelled automatically by cancellation of the Hazardous Waste Facility Pollution Liability Endorsement in Part II.

Part II Hazardous Waste Facility Pollution Liability Endorsement

1. This endorsement certifies that the policy to which the endorsement is attached provides pollution liability insurance covering bodily injury and property damage in connection with the insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 or 265.147. The coverage applies at EPA Identification Number 14D 0316000191
Name: BODINE ELECTRIC COMPANY
Address: 2500 WEST BRADLEY PLACE, CHICAGO, ILLINOIS, 60618
for sudden accidental occurrences. The limits of liability are \$ 1,000,000
"each occurrence" and \$ 2,000,000 annual aggregate, exclusive of legal defense costs.
2. The insurance afforded with respect to such occurrences is subject to all of the terms and conditions of the policy; provided, however, that any provisions of the policy inconsistent with subsections (a) through (e) of the Paragraph 2 are hereby amended to conform with subsections (a) through (e):
 - (a) Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy to which this endorsement is attached.
 - (b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 264.147(f) or 265.147(f).
 - (c) Whenever requested by a Regional Administrator of the U.S. Environmental Protection Agency (EPA), the Insurer agrees to furnish to the Regional Administrator a signed duplicate original of the policy and all endorsements.
 - (d) Cancellation of this endorsement, whether by the Insurer or the insured, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Regional Administrators of the EPA Regions in which the facilities are located.
 - (e) Any other termination of this endorsement will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Regional Administrators of the EPA Regions in which the facilities are located.

Attached to and forming part of Policy No. 83 C HC1661W
issued by HARTFORD INSURANCE COMPANY OF ILLINOIS, herein called the Insurer,
(Name of Insurer)
of 100 S. WACKER DRIVE, CHICAGO, IL 60606 to BODINE ELECTRIC COMPANY
(Address of Insurer) (Name of Insured)
of 2500 WEST BRADLEY PLACE, CHICAGO, ILLINOIS 60618
(Address of Insured)
this 1ST day of MARCH, 1983. The effective date of said policy is
1ST day of MARCH, 1983.

I hereby certify that the wording of this endorsement is identical to the wording specified in 40 CFR 264.151(i) as such regulation as constituted on the date first above written, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more States.

(Signature of Authorized Representative of Insurer)

MARTHA DONOHOE

(Type Name)

CASUALTY MANAGER

Authorized Representative of HARTFORD INSURANCE COMPANY OF ILLINOIS

(Title)

(Name of Insurer)

100 S. WACKER DRIVE, CHICAGO, ILLINOIS 60606

(Address of Representative)

WASTE MANAGEMENT
DIVISION

Hazardous Waste Facility Certificate of
Pollution Liability Insurance

1. American Motorists Insurance Company, (the "Insurer") , of 20 North Wacker Drive, Chicago, Illinois 60606 hereby certifies that it has issued pollution liability insurance covering bodily injury and property damage to Bodine Electric Company, (the "Insured") of 2500 West Bradley Place, Chicago, Illinois 60618 in connection with the insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 or 265.147. The coverage applies at:

Name, Address

Bodine Electric Company
2500 West Bradley Place
Chicago, Illinois 60618

EPA Identification Number

ILD005069224

for sudden accidental occurrences. The limits of liability are \$500,000 each occurrence and \$500,000 annual aggregate exclusive of legal defense costs. The coverage is provided under policy number 2YM 446 332, issued on 1-10-83.

2. The Insurer further certifies the following with respect to the insurance described in Paragraph 1.
 - (a) Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy.
 - (b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 264.147(f) or 265.147(f).
 - (c) Whenever requested by a Regional Administrator of the U.S. Environmental Protection Agency (EPA) the Insurer agrees to furnish to the Regional Administrator a signed duplicate original of the policy and all endorsements.
 - (d) Cancellation of the Insurance, whether by the Insurer or the Insured, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Regional Administrators of the EPA Regions in which the facilities are located.

- (e) Any other termination of the insurance will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Regional Administrators of the EPA Regions in which the facilities are located.

I hereby certify that the wording of this instrument is identical to the wording specified in 40 CFR 264.151 (j) as such regulation was constituted on the date first above written, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more States.



John L. Riggio
Commercial Casualty Underwriting Manager
Authorized Representative of
American Motorists Insurance Company
20 North Wacker Drive
Chicago, Illinois 60606

6044G

**C.2 Compliance/
Enforcement**



Environmental Protection Agency

1701 S. First Street Maywood, IL. 60153

#989

312/345-9780

Refer to: 03160603 - Cook County - Chicago/Bodine Electric Company
ILD005069224

November 23, 1982

Bodine Electric Company
2500 W. Bradley Place
Chicago, Illinois 60618

Attn: Ralph Juchcinski

Dear Mr. Juchcinski:

On October 19, 1982, representatives of the Illinois Environmental Protection Agency (IEPA) conducted an inspection of Bodine Electric Company. The purpose of the inspection was to determine your facility's compliance with the Environmental Protection Act, Ill. Rev. Stat. 1982, Ch. 111 1/2, pars. 1001 et seq., as amended, and regulations adopted by the Illinois Pollution Control Board. During the inspection the following apparent violations were observed:

Pursuant to 35 Ill. Adm. Code 725.115(b), the owner/operator must develop and follow a written schedule for inspection of all equipment and devices that are important to preventing, detecting or responding to environmental or human health hazards. At the time of the inspection, no written inspection schedule was available.

Pursuant to 35 Ill. Adm. Code 725.172 the owner/operator must keep a written operating record at the facility. The operating record must include the following:

- 1) A description and the quantity of each hazardous waste received and the method(s) and date(s) of its treatment, storage or disposal at the facility as required by Appendix I of 35 Ill. Adm. Code 725.173.
- 2) The location and quantity of each hazardous waste within the facility including cross-references to specific manifest document numbers.
- 3) Records and results of waste analyses and trial tests.
- 4) Summary reports and details of all incidents that require implementation of the contingency plan.
- 5) Records and results of inspections.

- 6) Monitoring and testing data.
- 7) All closure cost estimates and for disposal facilities
all post-closure cost estimates.

You are in apparent violation of 35 Ill. Adm. Code 725.173 for the following reasons: A written operating record was not available at the time of the inspection, and although much of the information was available, it should be incorporated into an operating record.

You are hereby requested to submit to this office, within 15 days of receipt of this letter, a description of steps taken to correct the apparent violations described in this letter. Failure to correct these apparent violations may result in enforcement actions. Please send your reply to the above address. Should you have any questions concerning this matter, please contact Mr. Jim Wiggins of my staff at the above number.

Sincerely,



Kenneth P. Bechely, Northern Region Manager
Field Operations Section
Division of Land Pollution Control

KPB:JKW:prb

Enclosures: Inspection Report & Hazardous Waste Regs.

cc: Division File
Northern Region
U.S. E.P.A. - Region V

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form A - General Facility Standards

#989

I. General Information:

- (A) Facility Name: Rodini Electric Company
(B) Street: 2500 W. Bradley Pl.
(C) City: Chicago (D) State: Illinois (E) Zip Code: 60618
(F) Phone: 312/4783515 (G) County: Cook
(H) Operator: Rodini Electric Company
(I) Street: 2500 W. Bradley Pl.
(J) City: Chicago (K) State: Illinois (L) Zip Code: 60618
(M) Phone: 312/4783515 (N) County: Cook
(O) Owner: Rodini Electric Company
(P) Street: 2500 W. Bradley Pl.
(Q) City: Chicago (R) State: Illinois (S) Zip Code: 60618
(T) Phone: 312/4783515 (U) County: Cook
(V) Date of Inspection: 10-19-82 (W) Time of Inspection (From) 10:00am (To) 11:30am
(X) Weather Conditions: 50°F - overcast - light rain

Rev. 3-6-81/J.B.

pages 11-18, 21 & 23 N/A
not applicable

(Y) Person(s) Interviewed

Title

Telephone

Ralph E. Guckeinski

Plant Engineer

312/4783515

Jim Johnson

Manufacturing Engineer

312/4783515

(Z) Inspection Participants

Agency/Title

Telephone

Jim Wiggins

EPA Environmental
Protection Specialist

312/3459780

Ralph E. Guckeinski

Plant Engineer

312/4783515

Jim Johnson

Offg. Engineer

312/4783515

(AA) Preparer Information

Name

Agency/Title

Telephone

Jim Wiggins

EPA Environmental
Protection Specialist

312/3459780

II. SITE ACTIVITY:

Complete sections I through VII for all treatment, storage, and/or disposal facilities. Complete the forms (in parenthesis) in section VIII corresponding to the site activities identified below:

☒ A. Storage and/or Treatment

1. Containers (I)

2. Tanks (J)

3. Surface Impoundments (K)

4. Waste Piles (L)

☐ B. Land Treatment (M)

☐ C. Landfills (N)

☐ D. Incineration and/or Thermal Treatment
(O and P)

☐ E. Chemical, Physical, and Biological
Treatment (Q)

Note: If facility is also a generator or transporter of hazardous waste complete sections IX and X of this form as appropriate.

III. GENERAL FACILITY STANDARDS:
(Part 265 Subpart B)

	Yes	No	NI*	Remark
(A) Has the Regional Administrator been notified regarding:				
1. Receipt of hazardous waste from a foreign source?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<i>none has been received</i>
2. Facility expansion?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
(B) General Waste Analysis:				
1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Does the owner or operator have a detailed waste analysis plan on file at the facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<i>none accepted from off site</i>
(C) Security - Do security measures include: (if applicable)				
1. 24-Hour surveillance?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Artificial or natural barrier around facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Controlled entry?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Danger sign(s) at entrance?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(D) Do Owner or Operator Inspections Include:				
1. Records of malfunctions?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<i>none have occurred</i>
2. Records of operator error?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<i>none have occurred</i>
3. Records of discharges?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<i>none have occurred</i>

*Not Inspected

	Yes	No	NI*	Remarks
4. Inspection schedule?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. Safety, emergency equipment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. Security devices?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7. Operating and structural devices?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. Inspection log?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(E) Do personnel training records include: (Effective 5/19/81)				
1. Job titles?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Job descriptions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Description of training?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Records of training?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. Have facility personnel received required training by 5-19-81?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. Do new personnel receive required training within six months?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<i>no new personnel have been hired</i>
(F) If required are the following special requirements for ignitable, reactive, or incompatible wastes addressed?				
1. Special handling?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. No smoking signs?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Separation and protection from ignition sources?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

*Not Inspected

IV. PREPAREDNESS AND PREVENTION:
(Part 265 Subpart C)

Maintenance and Operation
of Facility:

	Yes	No	NI*	Remarks
Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?	—	✓	—	_____
(B) If required, does the facility have the following equipment:				
1. Internal communications or alarm systems?	✓	—	—	_____
2. Telephone or 2-way radios at the scene of operations?	✓	—	—	_____
3. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	✓	—	—	_____

Indicate the volume of water and/or foam available for fire control:

Local fire dept. can respond in 90 seconds - facility has redundant sprinkler system - water 1500 gallons 1000 gallons in backup

(C) Testing and Maintenance of
Emergency Equipment:

1. Has the owner or operator established testing and maintenance procedures for emergency equipment?	✓	—	—	_____
2. Is emergency equipment maintained in operable conditions?	✓	—	—	_____

(D) Has owner or operator provided immediate access to internal alarms? (if needed)

✓	—	—	_____
---	---	---	-------

*Not Inspected

(E) Is there adequate aisle space for unobstructed movement?

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES:
(Part 265 Subpart D)

(A) Does the Contingency Plan contain the following information:

Yes No NI* Remarks

1. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)

✓

2. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?

✓

3. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?

✓

4. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?

✓

5. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)

✓

*Not Inspected

Yes No NI* Remarks

3) Are copies of the Contingency Plan available at site and local emergency organizations?

☒

(C) Emergency Coordinator

1. Is the facility Emergency Coordinator identified?

☒

2. Is coordinator familiar with all aspects of site operation and emergency procedures?

☒

3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?

☒

(D) Emergency Procedures

If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?

☒ none has yet occurred

VI. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING
(Part 265 Subpart E)

Yes No NI* Remarks

(A) Use of Manifest System

1. Does the facility follow the procedures listed in §265.71 for processing each manifest?

☒ none received from off site

2. Are records of past shipments retained for 3 years?

☒

(B) Does the owner or operator meet requirements regarding manifest discrepancies?

☒ no waste received from off site

Not Inspected

(C) Operating Record

1. Does the owner or operator maintain an operating record as required in 265.73?

— ✓ —

2. Does the operating record contain the following information:

- **b. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in Appendix I?

— ✓ —

- c. The location and quantity of each hazardous waste within the facility?

— ✓ —

- ***d. A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)

— — ✓

n/a

- e. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?

— ✓ —

some information is available but not incorporated into operating record

- f. Reports detailing all incidents that required implementation of the Contingency Plan?

— — ✓

none have occurred

- g. All closure and post closure costs as applicable? (Effective 5-19-81)

~~—~~ ✓ —

available but needs to be incorporated into operating record.

** See page 33252 of the May 19, 1980, Federal Register.

*** Only applies to disposal facilities

*Not Inspected

VJ CLOSURE AND POST CLOSURE
(Part 265 Subpart G)

	Yes	No	NI*	Remarks
(A) Closure and Post Closure				
1. Is the facility closure plan available for inspection by May 19, 1981?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Has this plan been submitted to the Regional Administrator	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<i>closure has not begun</i>
3. Has closure begun?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4. Is closure estimate available by May 19, 1981?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

(B) Post closure care and use of property

Has the owner or operator supplied a post closure monitoring plan? (effective by May 19, 1981)

☐ ☐ ☒ *n/a*

VIII. FACILITY STANDARDS
(Part 265, Subparts I thru R)

I
USE AND MANAGEMENT OF CONTAINERS

Facility Name: Bodine Electric Date of Inspection: 10-19-82

	Yes	No	NI*	Remarks
1. Are containers in good condition?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Are containers compatible with waste in them?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Are containers stored closed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Are containers managed to prevent leaks?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. Are containers inspected weekly for leaks and defects?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>ignitable</i>

7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)

--- -- ☒ no incompatible

8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?

--- -- ☒ no incompatible

J
TANKS

Facility Name: N/A

Date of Inspection: N/A

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank?

--- -- ☒ N/A

2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?

--- -- ☒ N/A

3. Do continuous feed systems have a waste-feed cutoff?

--- -- ☒ N/A

4. Are waste analyses done before the tanks are used to store a substantially different waste than before?

--- -- ☒ N/A

5. Are required daily and weekly inspections done?

--- -- ☒ N/A

6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)

--- -- ☒ N/A

7. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.)

--- -- ☒ N/A

	Yes	No	NI*	Remarks
3. Name and EPA ID Number of Transporter(s)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Name, address, and EPA ID Number of Designated permitted facility and alternate facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. The total quantity of waste(s) and the type and number of containers loaded?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7. Required certification?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. Required signatures?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(C) Does the owner or operator submit exception reports when needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<i>none have been required</i>

2. PRE-TRANSPORT REQUIREMENTS

(A) Is waste packaged in accordance with DOT Regulations? (Required prior to movement of hazardous waste off-site)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(B) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required to movement of hazardous waste off-site)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(C) If required, are placards available to transporters of hazardous waste?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

	Yes	No	NI*	Remarks
3. Has the owner or operator addressed the waste analysis requirements of 265.402?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>N/A</u>
4. Are inspection procedures followed according to 265.403?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>N/A</u>
5. Are the special requirements fulfilled for ignitable or reactive wastes?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>N/A</u>
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>N/A</u>

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristic under 40 CFR §261.22 or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason.

IX

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

1. MANIFEST REQUIREMENTS

	Yes	No	NI*	Remarks
(A) Does the operator have copies of the manifest available for review?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(B) Do the manifest forms reviewed contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements)				
1. Manifest document number?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Name, mailing address, telephone number, and EPA ID Number of Generator	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

VI. RECORDKEEPING and REPORTING
(Part 262, Subpart D)

	Yes	No	NI*	Remarks
(A) Are Manifests, Annual Reports, Exception Reports, and all test results and analyses retained for at least three years?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(B) Has the generator submitted Annual Reports and Exception Reports as required?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<i>none have been required</i>

VII. INTERNATIONAL SHIPMENTS
(Part 262, Subpart E)

Has the installation imported or exported Hazardous Waste?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
--	-------------------------------------	--------------------------	--

(If answered Yes, complete the following as applicable.)

1. Exporting Hazardous waste, has a generator:				
a. Notified the Administrator in writing?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>N/A</i>
b. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>N/A</i>
c. Met the Manifest requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>N/A</i>
2. Importing Hazardous Waste, has the generator:				
Met the manifest requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>N/A</i>

*Not Inspected

REMARKS

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

Bodine Electric Company is a manufacturer of fractional horsepower electric motors. They generate various types of waste solvents which are stored on site for longer than 90 days.

A written inspection schedule was not available at the time of the inspection. A written operating record was also not available indicating the location and quantity of each hazardous waste within the facility. Other information which was not incorporated into the operating records include records and results of waste analysis, tank data, monitoring data and operator inspections, & closure cost estimates. Much of this information was available, ~~but~~ however, it was not incorporated into the operating record.

L P C F C O 5 5 C
(1) (8) (9)

OBSERVATION REPORT - SITE INVENTORY NO.

(11)

(18)

CO. - L.P.C.

Region #

Date

(20)

(25)

Letter Sent (Yes or No)

(26)

(Location)

(Responsible Party)

Samples Taken: Yes () No (X)

Time: From 10 : 00 a m

Weather 50° F - overcast - rain

Ground Water () Surface () Other ()

To 11 : 30 a m

Photos Taken: Yes () No (X)

Interviewed Ralph Tomlinson

Inspector

(27)

(29)

Previous Inspection

Previous Correspondence

Site Open: Yes () No ()

OPERATIONAL STATUS:

TYPE OF OPERATION:

AUTHORIZATION:

Operating (X)

Landfill ()

Storage ()

E.P.A. Permit ()

Temporarily Closed ()

Random Dump ()

Salvage ()

Variance ()

Closed Not Covered ()

Other (X)

A.C.D. ()

21(e) ()

Closed and Covered ()

Quantity Received Daily(1-6)

(30)

Board Order ()

Illegal (5) ()

(31)

IMPROVED

LPC 4 1/79 5,000

SAME

DETERIORATED

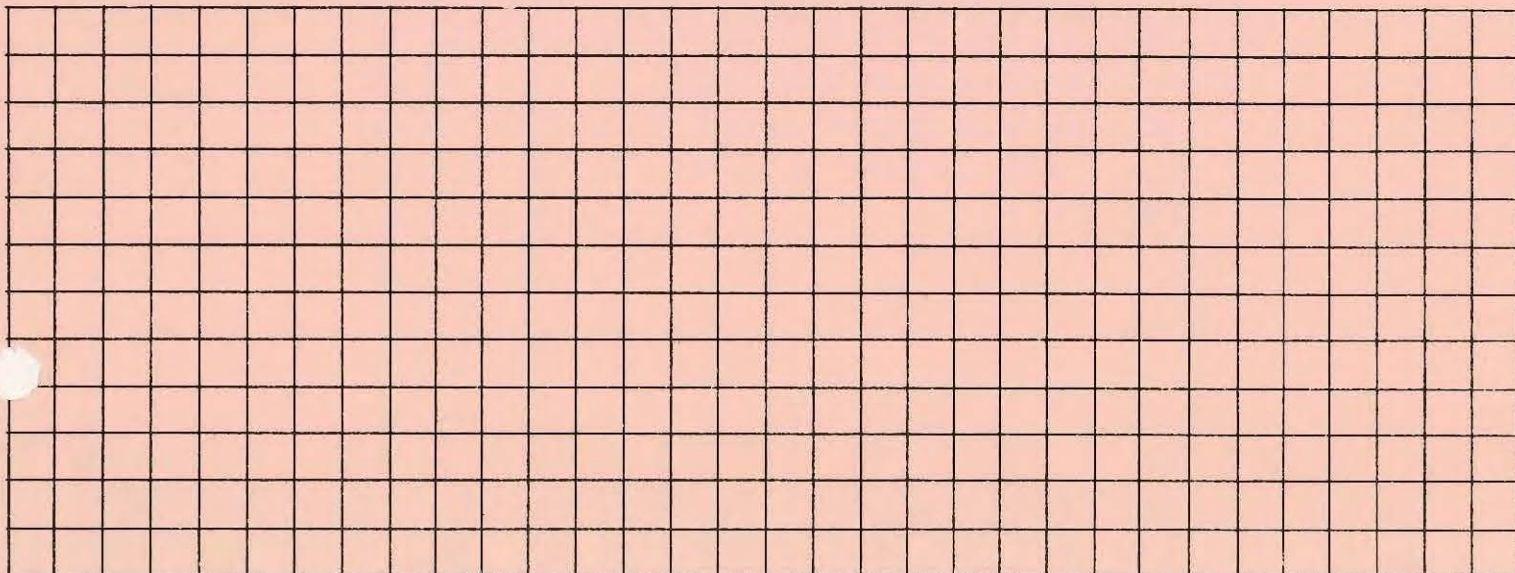
I S or D

(62)

GENERAL REMARKS:

INTERVIEW:

DIAGRAM:





11/30

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

HRE-8J

November 24, 1992

Mr. Duane Pecci
Bodine Electric Company
2500 West Bradley Place
Chicago, IL 60618

Re: Visual Site Inspection
Bodine Electric Company
Chicago, Illinois
ILD 005 069 224

Dear Mr. Pecci:

As indicated in the letter of introduction sent to you on January 22, 1992, the U.S. Environmental Protection Agency is enclosing a copy of the final Preliminary Assessment/Visual Site Inspection (PA/VSI) report for the referenced facility. The executive summary and conclusions and recommendations sections have been withheld as Enforcement Confidential.

If you have any questions, please call Francene Harris at (312) 886-2884.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Kevin M. Pierard".

Kevin M. Pierard, Chief
Minnesota/Ohio Technical Enforcement Section
RCRA Enforcement Branch

**D. Corrective
Action**



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST.

CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

January 22, 1992

HRE-8J

Mr. Duane Pecci
Bodine Electric Company
2500 West Bradley Place
Chicago, Illinois 60618

Re: Visual Site Inspection
Bodine Electric Company
Chicago, Illinois
ILD 005 069 224

Dear Mr. Pecci:

The United States Environmental Protection Agency (U.S. EPA) Region V will conduct a Preliminary Assessment including a Visual Site Inspection (PA/VSI) at the referenced facility. This inspection is conducted pursuant to the Resource Conservation and Recovery Act, as amended (RCRA) Section 3007 and the Comprehensive Environmental Response, Compensation, and Liability Act, as amended (CERCLA) Section 104 (e). The referenced facility has generated, treated, stored, or disposed of hazardous waste subject to RCRA. The PA/VSI requires identification and systematic review of all solid waste streams at the facility. The objective of the PA/VSI is to determine whether or not releases of hazardous wastes or hazardous constituents have occurred or are occurring at the facility which may require further investigation. This analysis will also provide information to establish priorities for addressing any confirmed releases.

The visual site inspection of your facility is to verify the location of all solid waste management units (SWMUs) and areas of concern (AOCs), and to make a cursory determination of their condition by visual observation. The definitions of SWMUs and AOCs are included in Attachment 1. The VSI supplements and updates data gathered during a preliminary file review. During this site inspection, no samples will be taken. A sampling visit to ascertain if releases of hazardous waste or constituents have occurred may be required at a later date.

Assistance of some of your personnel may be required in reviewing solid waste flow(s) or previous disposal practices. The site inspection is to provide a technical understanding of the present and past waste flows and handling, treatment, storage, and disposal practices. Photographs

of the facility are necessary to document the condition of the units at the facility and the waste management practices used.

The VSI has been scheduled for January 28, 1992. The inspection team will consist of personnel of B&V Waste Science and Technology Corp., a contractor for the U.S. EPA. Representatives of the Illinois Environmental Protection Agency (IEPA) may also be present. Your cooperation in admitting and assisting them while on site is appreciated.

The U.S. EPA recommends that personnel who are familiar with present and past manufacturing and waste management activities be available during the VSI. Access to any relevant maps, diagrams, hydrogeologic reports, environmental assessment reports, sampling data sheets, environmental permits (air, NPDES), manifests and/or correspondence is also necessary, as such information is needed to complete the PA/VSI.

If you have any questions, please contact me at (312) 886-4448 or Francine Harris at (312) 886-2884. A copy of the Preliminary Assessment/Visual Site Inspection Report, excluding the conclusions and Executive Summary portion will be sent when the report is available.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Francine K. Harris for".

Kevin M. Pierard, Chief
OH/MN Technical Enforcement Section

Attachment

cc: Larry Eastep, IEPA, Springfield
Gliff Gould, IEPA, Maywood



U.S. Environmental Protection Agency
Office of Waste Programs Enforcement
Contract No. 68-W9-0006



TES 9

**Technical Enforcement Support
at Hazardous Waste Sites
Zone III
Regions 5,6, and 7**



PRC Environmental Management, Inc.

PRC Environmental Management, Inc.
233 North Michigan Avenue
Suite 1621
Chicago, IL 60601
312-856-8700
Fax 312-938-0118



**PRELIMINARY ASSESSMENT/
VISUAL SITE INSPECTION**

**BODINE ELECTRIC COMPANY
CHICAGO, ILLINOIS
ILD 005 069 224**

FINAL REPORT

Prepared for

**U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460**

Work Assignment No.	:	C05087
EPA Region	:	5
Site No.	:	ILD 005 069 224
Date Prepared	:	November 6, 1992
Contract No.	:	68-W9-0006
PRC No.	:	009-C05087IL2H
Prepared by	:	B&V Waste Science and Technology Corp. Tim Moody
Contractor Project Manager	:	Shin Ahn
Telephone No.	:	(312) 856-8700
EPA Work Assignment Manager	:	Kevin Pierard
Telephone No.	:	(312) 886-4448

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- B VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS
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B&V Waste Science and Technology Corp. (BVWST) performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the Bodine Electric Company (Bodine Electric) facility in Chicago, Illinois. This summary highlights the results of the PA/VSI and the potential for releases of hazardous wastes or hazardous constituents from SWMUs. No AOCs were identified during the PA/VSI. In addition, a completed U.S. Environmental Protection Agency (EPA) Preliminary Assessment Form (EPA Form 2070-12) is included in Attachment A to assist in prioritization of RCRA facilities for corrective action.

Bodine Electric manufactures fractional horsepower alternate current (AC) and direct current (DC) motors, gear motors, and electronic speed control equipment. The facility generates and manages the following waste streams: aluminum and lead dross (D008), rust inhibitor (D001), nonhazardous water-based coolant, waste oil (D001), nonhazardous oil-coated scrap metal, paint sludge (F005), varnishing waste (D001), and nonhazardous general office wastes. Spent mineral spirits (D001), spent methylene chloride (F001), and spent trichloroethylene (F001) are generated from cleaning parts in buckets or parts washers placed in about 15 locations throughout the facility and maintained by Safety Kleen Corp. (Safety Kleen) in Chicago, Illinois.

No AOCs were identified at the facility; however, the PA/VSI identified the following 10 SWMUs:

1. Dross Satellite Accumulation Area
2. Rust Inhibitor Satellite Accumulation Area
3. Olson Satellite Accumulation Area
4. Hyde Satellite Accumulation area
5. Screw Machine Satellite Accumulation Area
6. Scrap Metal Dumpster
7. Varnish Satellite Accumulation Area
8. Incinerator
9. Drum Storage Area
10. Loading Dock

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Bodine Electric has operated at its current location since 1957. The facility occupies 11 acres in an industrial and residential area and consists of one 370,000-square-foot building. This facility employs about 525 people. The facility's current regulatory status is that of a large-quantity generator of hazardous waste. The container storage area was RCRA closed in 1986 as an area of hazardous waste storage for longer than 90 days. IEPA approved closure on October 5, 1987. RCRA inspections were conducted by IEPA on October 19, 1982, and July 18, 1985. Enforcement action was recommended in 1973 for odor complaints from the facility by area residents. No further information regarding this inspection was available. Violations were also noted in 1985, including no written schedule of inspection for equipment, no written operating record, personnel training inadequacies, no waste analysis plan, an inadequate contingency plan, and no weekly inspections. No record of subsequent compliance regarding these violations was available.

Before 1957, the land was used as a golf course. Painting, machining, and die casting operations run three shifts 7 days a week; all other operations run one day-shift Monday through Friday. Facility operations are generally the same as they were when operations began in 1957.

The facility is bordered on the north by a park and a parking lot, on the south by WGN television studios, on the east by residences and a parking lot, and on the west by an industrial park. The nearest school, Lane Technical High School, is located about 1/4 mile south of the facility. There is fencing at the northern side of the building, but it does not surround the property or prevent access onto the property. Facility access is controlled by a security guard during the second and third shifts.

The nearest surface-water body, the North Branch of the Chicago River, is about 1/8 mile west of the facility and is primarily used for industrial purposes. There are no other significant surface-water bodies within 2 miles of the facility.

Ground water is not used as a drinking-water supply. The location of the nearest drinking-water well is unknown. Lake Michigan, located approximately 4 miles east of the facility, is the drinking-water source for Chicago. Sensitive environments are not located onsite. The nearest wetland is located about 1/8 mile west of the site.

One release has been documented at the Bodine Electric facility. This release occurred in May 1991, while an employee was dumping oil-coated scrap metal into the Scrap Metal Dumpster

RELEASED
DATE 2/8/01
RIN # 0758-0
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(SWMU 6). The oil, which contained trace amounts of lead, leaked into a floor drain, discharging an undetermined amount to the sanitary sewer. This was caused by an employee who did not remove the lead-carrying cutting oils from the metal chips, enabling the oils to leak onto the floor and into the drain. An 18-inch-high concrete barrier was built around the drain and absorbent materials were put in the drain to prevent oils from escaping into the sewer system in the future. Water in the drain was sampled and the incident was absolved by the Metropolitan Water Reclamation District of Greater Chicago.

The container storage area (S01) was RCRA closed in 1986 as an area of hazardous waste storage for longer than 90 days, in accordance with the approved closure requirements of Interim Status Standards 35 Illinois Administrative Code, Part 725 (40 CFR Part 265). Closure activities involved removal of all hazardous wastes in storage, decontamination and rinsing of the storage area, and sampling and analysis of the rinsate. The Illinois Environmental Protection Agency (IEPA) approved closure on October 5, 1987. The facility currently operates as a large-quantity generator of hazardous waste only.

The facility has permits to operate the following emission sources and/or air pollution control equipment: boilers; crucible furnaces; waterwash paint booths; soldering areas; gear cutters; grinders; polishers; belt sanders; varnish drying ovens; and one parts dryer, parts washer, degreaser, epoxy booth, varnish trickle machine, paint drying oven, incinerator, melting pot, preheat and annealing furnace, acid varnish stripper, rotor undercutter, drilling/tapping machine with rotocyclones, and electrostatic epoxy applicator with dust collector.

Bodine Electric has had two occurrences of problems regarding air emissions. In February 1973, an EPA investigation of Bodine Electric was conducted and residents in the area of the facility were asked for their observations. All complained of smoke and odors from the facility and were willing to testify. Enforcement action was recommended. No further information regarding this investigation was available. In September 1985, the following air permit violations were noted: failure to secure a current operating permit, failure to keep a maintenance record for air pollution control equipment, and failure to submit a fugitive dust operating program for the parking lot. No further information regarding this investigation was available. The facility is not required to have a National Pollutant Discharge Elimination System (NPDES) permit.

The potential is low for release of hazardous constituents from all facility SWMUs to ground water, surface water, air, and on-site soils. All of the SWMUs are located indoors and

above ground. All of the containers used to store waste are in good condition with no visible signs of cracks or leakage. Containers are kept on a concrete floor throughout the facility. The floor is in good condition, showing no visible signs of cracking. No waste is stored at this facility for longer than 90 days.

BVWST recommends that no further action be taken for the facility.

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1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC) received Work Assignment No. C05087 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5. As a team member with PRC under the TES 9 contract, B&V Waste Science and Technology Corp. (BVWST) conducted the PA/VSI for the Bodine Electric Company (Bodine Electric) facility.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells.
- Closed and abandoned units.
- Recycling units, wastewater treatment units, and other units that EPA has generally exempted from standards applicable to hazardous waste management units.
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading-unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release to the environment of hazardous waste or constituents has occurred or is suspected to have occurred on a nonroutine and nonsystematic

basis. This includes any area where such a release in the future is judged to be a strong possibility.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility.
- Obtain information on the operational history of the facility.
- Obtain information on releases from any units at the facility.
- Identify data gaps and other informational needs to be filled during the VSI.

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA.
- Identify releases not discovered during the PA.
- Provide a specific description of the environmental setting.
- Provide information on release pathways and the potential for releases to each medium.
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases.

The VSI includes interviewing appropriate facility staff, inspecting the entire facility to identify all SWMUs and AOCs, photographing all visible SWMUs, identifying evidence of releases, initially identifying potential sampling parameters and locations, if needed, and obtaining all information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the Bodine Electric facility in Chicago, Illinois. The PA was completed on February 7, 1992. BVWST gathered and reviewed information from the Illinois Environmental Protection (IEPA) files, EPA Region 5 RCRA files, Federal Emergency Management Agency (FEMA) flood plain maps, National Wetland Inventory Maps

(NWI), United States Geological Survey (USGS) topographic maps, and the United States Department of Agriculture (USDA). The VSI was conducted on February 10, 1992. It included interviews with one facility representative and a walk-through inspection of the facility. BVWST identified 10 SWMUs and no AOCs at the facility.

BVWST completed EPA Form 2070-12 using information gathered during the PA/VSI. This form is included in Attachment A. The VSI is summarized and nine inspection photographs are included in Attachment B. Field notes from the VSI are included in Attachment C.

2.0 FACILITY DESCRIPTION

This section describes the facility's location, past and present operations (including waste management practices), waste generating processes, history of documented releases, regulatory history, environmental setting, and receptors.

2.1 FACILITY LOCATION

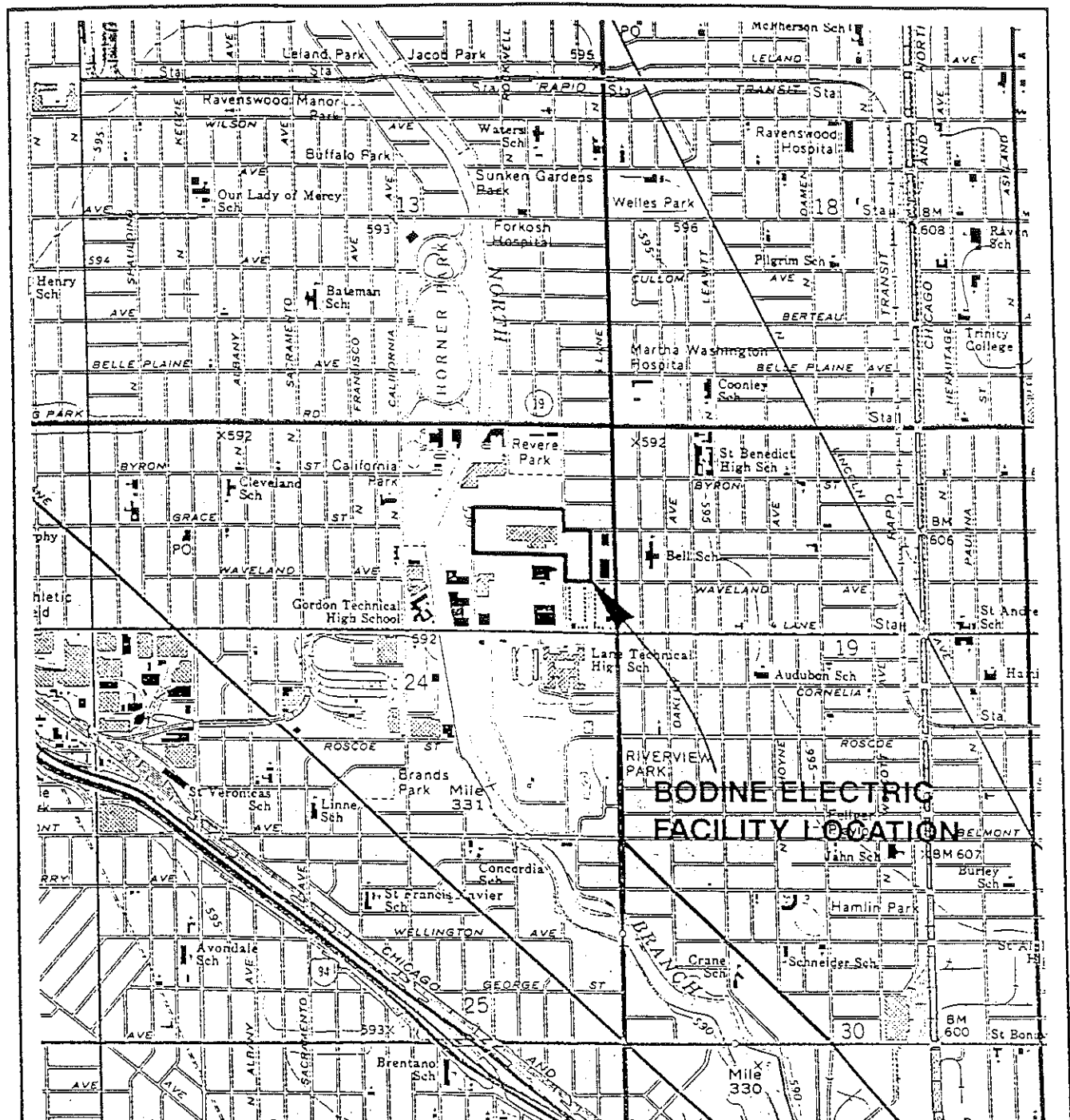
The Bodine Electric facility is located at 2500 West Bradley Place in Chicago, Cook County, Illinois. Figure 1 shows the location in relation to the surrounding topographic features (latitude 41° 53' 45" N and longitude 87° 41' 2" W). The facility occupies 11 acres in an industrial and residential area and consists of one 370,000-square-foot building. The facility is bordered on the north by a park and a parking lot, on the south by WGN television studios, on the east by residences and a parking lot, and on the west by an industrial park.

2.2 FACILITY OPERATIONS

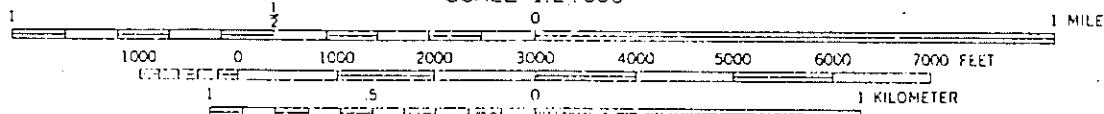
Bodine Electric manufactures fractional horsepower alternate current (AC) and direct current (DC) motors, gear motors, and electronic speed control equipment. Facility operations can be subdivided into two interrelated divisions: the component manufacturing division and the component assembly division.

The component manufacturing division consists of die casting, painting, and machining. Two kinds of parts are manufactured: stators (stationary parts) and rotors (moving parts). Stator production starts with die casting. Motor housings, end shields, and bases are die cast in automatic, gas-fired crucibles where aluminum and zinc ingots are melted down. The die cast machines operate at 1,250°F. This process generates aluminum and lead dross (D008). Five die cast machines are located in the die casting room at the northeastern part of the facility. There is an approximately 2-square-foot by 6- to 8-inch deep metal drop pan for each of the die cast machines in this area. Waste aluminum and lead dross that falls into the drop pans is cooled and then emptied into either 55-gallon drums or 4-cubic-foot steel containers.

Stator and rotor parts are washed in portable Safety Kleen parts washers placed in approximately 15 stations throughout the facility. The Safety Kleen parts washers contain mineral spirits, methylene chloride, and trichloroethylene. Safety Kleen removes, recycles, and replaces



SCALE 1:24 000



SOURCE:

CHICAGO LOOP QUADRANGLE
ILLINOIS-COOK CO.
7.5 MINUTE SERIES (TOPOGRAPHIC)



QUADRANGLE LOCATION

BODINE ELECTRIC
CHICAGO, ILLINOIS

FIGURE 1
FACILITY LOCATION



the contents of these parts washers. The stator parts are then primed and spray painted with black enamel. This is done in either one of two spray paint booths that use a water-scrubbing system and are controlled by a water-wash curtain. Painting generates a paint sludge (F005). After being painted, parts are dried in two continuous gas-fired bake ovens operating at 275°F.

Next, the stator parts are dip coated in trickle varnish machines, and then dried in three walk-in type paint bake ovens which operate at 275°F. The coating process also consists of spray coating parts in automatic indexing, baffle-controlled spray booths. This process generates rust inhibitor (D001). After coating, most stators are finished and ready for motor assembly with rotors.

To produce rotors, raw metal is ground, drilled, and cut in the machining area. Grinders, rotocyclones, and lathes are used on the raw metal, generating scrap metal. This scrap metal may be coated with waste oil (D001). Oil-coated scrap metal is put through a screw machine chip spinner at the southeastern part of the facility. This machine separates the oil from the metal so that the metal can be either reused or disposed of. The rotor parts, like stators, are also spray coated in the automatic indexing, baffle-controlled spray booth, generating rust inhibitor (D001). Rotors are then sanded and polished, after which they are ready to be assembled with the stators.

The component assembly division is typically the final stage of manufacturing. After assembly, however, some parts are varnished using a dip tank or trickle process, generating varnishing waste (D001). After the varnish application, all parts are considered finished.

This facility has ten solid waste management units. The Dross Satellite Accumulation Area (SWMU 1) is used to accumulate aluminum and lead dross (D008) from die casting operations. Initially, this waste is stored in SWMU 1 in either 55-gallon drums or 4-cubic-foot steel containers then moved to the Loading Dock (SWMU 10) for pick up.

The Rust Inhibitor Satellite Accumulation Area (SWMU 2) is used to accumulate waste rust inhibitor (D001) from the spray coating process. Initially, this waste is stored in SWMU 2 in 55-gallon drums then moved to and stored in the Drum Storage Area (SWMU 9). This waste is stored here until it is moved to the Loading Dock (SWMU 10) for pick up.

The Olson Satellite Accumulation Area (SWMU 3) consists of one or two satellite drums used to store a paper filter saturated with nonhazardous water-based coolant. This waste is

generated in an Olson machine, cut, crushed, and thrown into satellite drums. Initially, this waste is stored in SWMU 3 then moved to the Loading Dock (SWMU 10) and dumped with regular garbage.

The Hyde Satellite Accumulation Area (SWMU 4) consists of a satellite drum used to store waste oil (D001). This waste is generated in a Hyde machine, which pours the waste oil directly into the 55-gallon drum. Initially, this waste is stored in SWMU 4 then moved to and stored in the Drum Storage Area (SWMU 9). This waste is stored here until it is moved to the Loading Dock (SWMU 10) for pick up.

The Screw Machine Satellite Accumulation Area (SWMU 5) consists of one or two satellite drums used to store nonhazardous oil-coated scrap metal. The oil-coated scrap metal is put into a screw machine chip spinner to separate the oil from the metal. The oil is retained and reused and the metal chips, with small traces of waste oil remaining, are placed in the 55-gallon drums. Initially, the oil-coated scrap metal is stored in SWMU 5 then moved to the Scrap Metal Dumpster (SWMU 6).

The Scrap Metal Dumpster (SWMU 6) receives the nonhazardous oil-coated scrap metal from the Screw Machine Satellite Accumulation Area (SWMU 5). This waste is stored in SWMU 6 until it is picked up.

The Varnish Satellite Accumulation Area (SWMU 7) is used to accumulate varnishing waste (D001). Varnishing waste is put into 55-gallon steel drums. The waste is poured through funnels inserted in the drum openings. Initially, this waste is stored in SWMU 7 then moved to the Drum Storage Area (SWMU 9). This waste is stored here until it is moved to the Loading Dock (SWMU 10) for pick up.

The Incinerator (SWMU 8) is used to incinerate nonhazardous office wastes, including paper, wood, rags, and miscellaneous refuse. This unit is a Goder Model No. 28-N, class 3, with a multiple chamber, single burner, controlled by an afterburner and wet scrubber. Both burners are rated at 800,000 British Thermal Units (BTU). This unit is an approximately 15-foot high by 10-foot long by 8-foot wide steel, gas-fired structure. This unit operates three hours per day, five days per week and burns 200 pounds per hour.

The Drum Storage Area (SWMU 9) is used to store all wastes generated at the facility except aluminum and lead dross, oil-coated scrap metal, and nonhazardous office wastes. Wastes are stored in SWMU 9 in 55-gallon drums. This area is also used to store raw materials, which include aluminum ingot, steel bar and rod stock, electrolytic steel, sheet stock, steel, bronze, bakelite gear blanks, insulated copper wire, antrification bearings, and other mechanical components. Wastes are stored here until they are moved to the Loading Dock (SWMU 10) for pick up.

The Loading Dock (SWMU 10) is used to receive all raw material coming into the facility. It is also used to load all wastes as they are picked up and taken away from the facility. Wastes are usually brought here one or two days before they are scheduled to be picked up.

Parts are cleaned during various machining processes. Cleaning is done at each work station using either a portable Safety Kleen parts washer or small steel buckets. Safety Kleen removes, recycles, and replaces the contents of these parts washers. If a bucket is used to clean parts, wastes are taken to the Drum Storage Area (SWMU 9) and emptied into 55-gallon drums which are moved to and then picked up from the Loading Dock (SWMU 10) by Safety Kleen for recycling.

The facility has been at its current location since the building was erected in 1956 and operations began in 1957. Before that, the land was used as a golf course. Bodine Electric employs about 525 people. The painting, machining, and die casting operations run three shifts seven days a week; all other operations run one day-shift Monday through Friday. Facility operations are generally the same as they were when operations began in 1957.

Facility SWMUs are identified in Table 1. The facility layout, including SWMUs, is shown in Figure 2. Solid waste generated from facility operations and the SWMUs where they are managed are discussed in detail in Section 2.3.

2.3 WASTE GENERATING PROCESSES

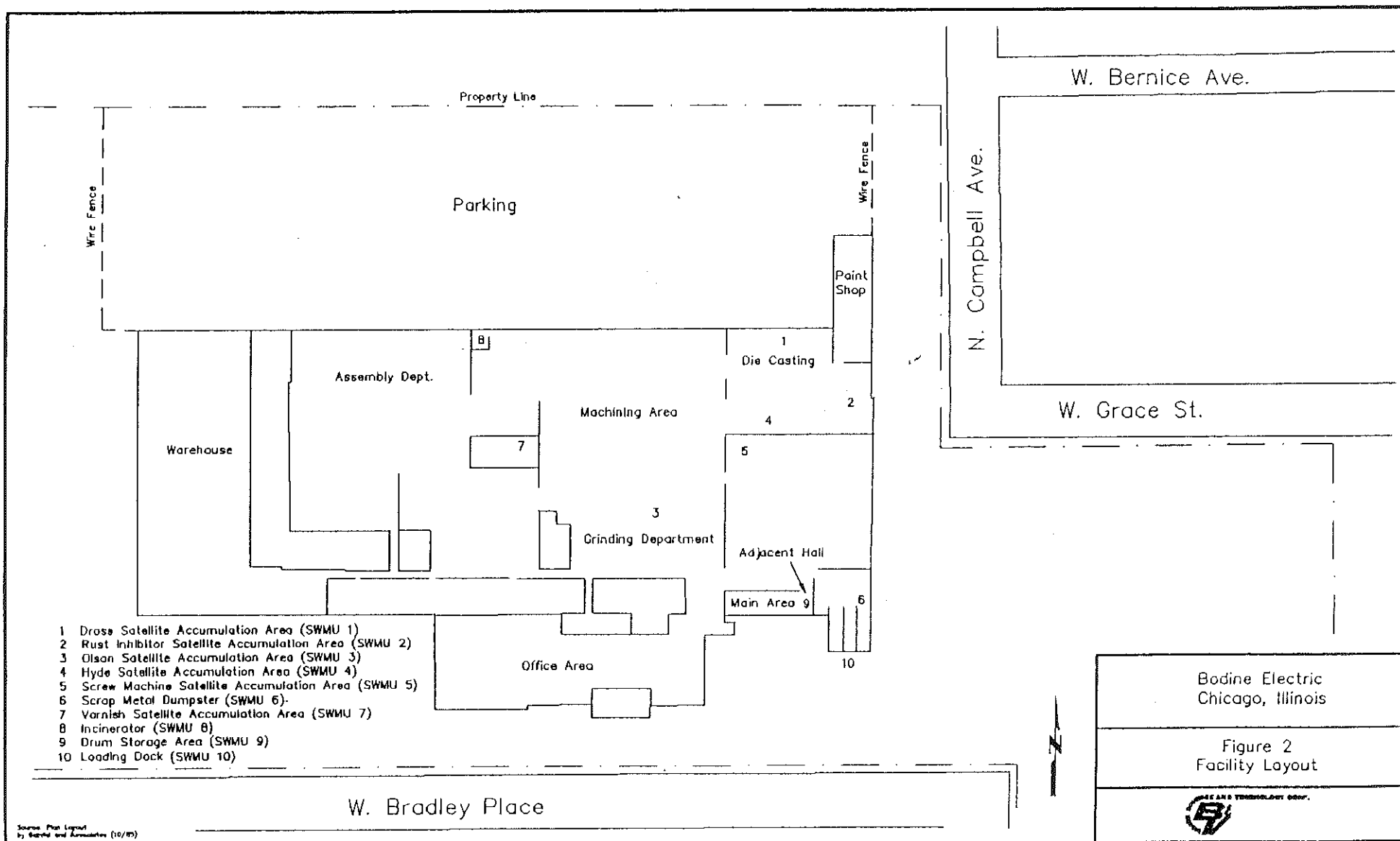
The primary waste streams generated at the Bodine Electric facility are aluminum and lead dross (D008), rust inhibitor (D001), nonhazardous water-based coolant, waste oil (D001), nonhazardous oil-coated scrap metal, paint sludge (F005), varnishing waste (D001), and nonhazardous office wastes. Spent mineral spirits (D001), spent methylene chloride (F001), and

TABLE 1
SOLID WASTE MANAGEMENT UNITS (SWMU)

SWMU Number	SWMU Name	RCRA Hazardous Waste Management Unit *	Status
1	Dross Satellite Accumulation Area	No	Active
2	Rust Inhibitor Satellite Accumulation Area	No	Active
3	Olson Satellite Accumulation Area	No	Active
4	Hyde Satellite Accumulation Area	No	Active
5	Screw Machine Satellite Accumulation Area	No	Active
6	Scrap Metal Dumpster	No	Active
7	Varnish Satellite Accumulation Area	No	Active
8	Incinerator	No	Active
9	Drum Storage Area	Yes	RCRA-closed; currently used for less than 90-day storage of waste.
10	Loading Dock	No	Active

Note:

- * A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B permit application.



spent trichloroethylene (F001) are generated from parts washers or buckets. Safety Kleen in Chicago, Illinois maintains the parts washers. Buckets of spent mineral spirits, spent methylene chloride, and spent trichloroethylene are emptied into drums in the Drum Storage Area (SWMU 9). Wastes are generated during the production of fractional horsepower AC and DC motors, gear motors, and electronic speed control equipment. Wastes generated at the facility are discussed below and summarized in Table 2.

Die casting consists of melting down metal parts in automatic, gas-fired crucibles. This process generates aluminum and lead dross (D008). Five die cast machines are located in the die casting room at the northeastern part of the facility. The die cast machines operate at 1,250°F. There is a 2-foot-square, 6-to 8-inch deep metal drop pan for each of the die cast machines in this area. Waste aluminum and lead dross (D008) falls into the drop pans, cools, and is emptied into either 55-gallon drums or 4-cubic-foot steel containers. Waste is accumulated and temporarily stored in the Dross Satellite Accumulation Area (SWMU 1) then transported to the Loading Dock (SWMU 10) for pick up and recycling by Scimitar in Highland Park, Illinois. About two 55-gallon drums of this waste are generated weekly.

The coating process consists of spray coating parts in automatic indexing, baffle-controlled spray booths. This process generates rust inhibitor (D001). Rust inhibitor is pumped from the booth through flexible, plastic tubing into a 55-gallon drum in the Rust Inhibitor Satellite Accumulation Area (SWMU 2). The drum lies on the concrete floor in an approximately 25-square-foot room at the northeastern part of the facility. After accumulation and temporary storage in this area, the drum is transported to and stored in the Drum Storage Area (SWMU 9). When this waste is ready to be picked up for recycling by Safety Kleen, it is moved to the Loading Dock (SWMU 10). About one to two 55-gallon drums of this waste are generated every three months.

The Olson unit, in the grinding department at the south central end of the machining area, generates a paper filter of nonhazardous water-based coolant which is cut, crushed, and put into a satellite drum. This waste is accumulated and temporarily stored in the Olson Satellite Accumulation Area (SWMU 3). When a drum is full and ready for disposal, the drum is moved to the Loading Dock (SWMU 10) and the contents are dumped in 4-cubic-foot steel containers. The paper filters are dumped into a dumpster with regular garbage and the steel containers are retained for reuse. About three to four of these steel containers are disposed of per week.

TABLE 2
SOLID WASTES

Waste/EPA Waste Code	Source	Primary Management Unit *
Aluminum and Lead Dross/(D008)	Die Casting	1 and 10
Rust Inhibitor (D001)	Spray Coating	2, 9, and 10
Water-Based Coolant/NA**	Olson Recycler	3 and 10
Waste Oil (D001)	Hyde Recycler; Machining Processes	4, 9, and 10
Oil-Coated Scrap Metal/NA	Machining Processes	5 and 6
Paint Sludge (F005)	Painting Operation	9 and 10
Varnishing Waste (D001)	Varnishing Operation	7, 9, and 10
General Office Wastes/NA	General Facility Operations	8
Spent Mineral Spirits (D001)	Parts Washing	9 and 10
Spent Methylene Chloride (F001)	Parts Washing	9 and 10
Spent Trichloroethylene (F001)	Parts Washing	9 and 10

Notes:

- * Primary management unit refers to a SWMU that currently manages or formerly managed the waste.
- ** Nonapplicable (NA) designates nonhazardous waste.

The Hyde recycling system extracts machining oil from coolant. The coolant is recycled back into the machining process. This process generates waste oil (D001). This waste is accumulated and temporarily stored in 55-gallon drums in the Hyde Satellite Accumulation Area (SWMU 4) at the northeastern part of the facility. Full drums are transported to and stored in the Drum Storage Area (SWMU 9). When this waste is ready to be picked up for recycling by Safety Kleen, it is moved to the Loading Dock (SWMU 10). About 10 to 15 55-gallon drums of this waste are generated every three months.

Machining operations result in the disposal of metal pieces. This process generates nonhazardous oil-coated scrap metal. This waste is generated in the machining area at the middle and northeastern part of the facility. The oil-coated scrap metal is put into a screw machine chip spinner at the southeastern part of the facility to remove the oil from the metal. About 90 percent of the oil is removed from the metal chips and reused onsite. The oil-coated scrap metal is temporarily stored in the Screw Machine Satellite Accumulation Area (SWMU 5), consisting of a 55-gallon drum, then transported to and dumped into the Scrap Metal Dumpster (SWMU 6). About one dumpster is picked up by Midwest Metals in Chicago, Illinois for recycling every month.

Painting parts is done in the paint shop at the northeastern corner of the facility. This process generates paint sludge (F005) which is containerized in 55-gallon drums and stored in the Drum Storage Area (SWMU 9). When this waste is ready to be picked up for recycling by Safety Kleen, it is moved to the Loading Dock (SWMU 10).

Varnishing operations consist of dip coating parts in the trickle varnish machines. This process generates varnishing waste (D001). This waste is poured into drums through funnels inserted in the drum openings. This waste is accumulated and temporarily stored in 55-gallon drums in the Varnish Satellite Accumulation Area (SWMU 7) just west of the machining area at the middle of the facility. When full, a drum is transported to the Drum Storage Area (SWMU 9). When this waste is ready to be picked up for recycling by Safety Kleen, it is moved to the Loading Dock (SWMU 10). About two 55-gallon drums are generated every 3 months.

This facility has an Incinerator (SWMU 8) located at the north central part of the main building between the assembly department and machine area. This unit burns nonhazardous office wastes, including paper, wood, rags, and miscellaneous office refuse. This unit is a Goder Model No. 28-N, class 3, with a multiple chamber, single burner, controlled by an afterburner and

wet scrubber. Both burners are rated at 800,000 British Thermal Units (BTU). This unit is an approximately 15-foot high by 10-foot long by 8-foot wide steel structure. This unit operates three hours per day, five days per week and burns 200 pounds of nonhazardous general office waste per hour.

Parts are cleaned during various machining processes. Cleaning is done at each work station using either a portable Safety Kleen parts washer or small steel buckets that generate spent mineral spirits (D001), spent methylene chloride (F001), and spent trichloroethylene (F001). Safety Kleen removes, recycles, and replaces the contents of the parts washers. If a bucket is used to clean parts, the waste is taken to the Drum Storage Area (SWMU 9) and emptied into 55-gallon drums which are moved to and picked up from the Loading Dock (SWMU 10) by Safety Kleen for recycling. Approximately six to 10 55-gallon drums are generated per year.

2.4 HISTORY OF DOCUMENTED RELEASES

This section discusses the history of documented releases to ground water, surface water, air, and on-site soils, at the Bodine Electric facility.

One release has been documented at the Bodine Electric facility. This release occurred in May 1991, while an employee was dumping oil-coated scrap metal into the Scrap Metal Dumpster (SWMU 6) (Bodine, 1992). An undetermined amount of oil, which contained trace amounts of lead, leaked into a floor drain discharging to the sanitary sewer. This was caused by an employee who did not remove the lead-carrying cutting oils from the metal chips, enabling the oils to leak onto the floor and into the drain. An 18-inch high concrete barrier was built around the drain and absorbent materials were put in the drain to prevent oils from escaping into the sewer system in the future. Water in the drain was sampled and the incident was absolved by the Metropolitan Water Reclamation District of Greater Chicago (MWRD, 1992).

2.5 REGULATORY HISTORY

Bodine Electric submitted a Notification of Hazardous Waste Activity to EPA on August 15, 1980 (USEPA, 1980a). This notification listed F001-F003, F017, U239, U228, U159, U210, and U080 hazardous wastes handled by the facility. Bodine Electric submitted a RCRA Part A Permit Application on November 17, 1980 (USEPA, 1980b). The application listed the following process codes and capacities: container storage (S01) 1,100 gallons. The application

listed the following pairs of wastes: F001/U228, F002/U080, F003/U239, F017/F018, F005/U159, U210, D001, and D006/D008 (Bodine, 1980).

The container storage area was RCRA closed in 1986 as an area of hazardous waste storage for longer than 90 days, in accordance with the approved closure requirements of Interim Status Standards 35 Illinois Administrative Code, Part 725 (40 CFR Part 265) (IEPA, 1987). Closure activities involved removal of all hazardous wastes in storage, decontamination and rinsing of the storage area, and sampling and analysis of the rinsate (IEPA, 1986). IEPA approved closure on October 5, 1987. The facility currently operates as a large-quantity generator of hazardous waste storing wastes for less than 90 days.

In the past, Bodine Electric has had RCRA compliance problems. RCRA inspections were conducted by IEPA on October 19, 1982, and July 18, 1985. Violations noted in these inspections included no written schedule of inspection for equipment, no written operating record, personnel training inadequacies, no waste analysis plan, an inadequate contingency plan, and no weekly inspections (IEPA, 1982, 1985a). No record of subsequent compliance regarding these violations was available.

The facility has permits to operate the following emission sources and/or air pollution control equipment: boilers; crucible furnaces; waterwash paint booths; soldering areas; gear cutters; grinders; polishers; belt sanders; varnish drying ovens; and one parts dryer, parts washer, degreaser, epoxy booth, varnish trickle machine, paint drying oven, incinerator, melting pot, preheat and annealing furnace, acid varnish stripper, rotor undercutter, drilling/tapping machine with rotocyclones, and electrostatic epoxy applicator with dust collector.

Bodine Electric has had two occurrences of problems regarding air emissions. In February 1973, an EPA investigation of Bodine Electric was conducted and residents in the area of the facility were asked for their observations. All complained of smoke and odors from the facility and were willing to testify. Enforcement action was recommended (IEPA, 1973). No further information regarding this investigation was available. In September 1985, the following air permit violations were noted: failure to secure current operating permit, failure to keep a maintenance record for air pollution control equipment, and failure to submit a fugitive dust operating program for the parking lot (IEPA, 1985c). No further information regarding this investigation was available.

The facility is not required to have a National Pollutant Discharge Elimination System (NPDES) permit. There have been no CERCLA or leaking underground storage tank (LUST) activities at this site.

2.6 ENVIRONMENTAL SETTING

This section describes the climate, flood plain and surface water, geology and soils, and ground water in the vicinity of the Bodine Electric facility.

2.6.1 Climate

The climate in Cook County is classified as humid continental type (USDA, 1979). The annual average daily maximum temperature is 58°F and the annual average daily minimum temperature is 39.7°F (NWB, 1991). The average precipitation from 1958 to 1990 was 33.3 inches per year, and the highest 24-hour rainfall was 9.3 inches in August 1987 (NWB, 1991). The overall wind direction varies seasonally with an average wind speed of 10.3 miles per hour (mph).

2.6.2 Flood Plain and Surface Water

The Bodine Electric facility is located in a non-flood prone area (FEMA, 1981). The nearest surface water body, the North Branch of the Chicago River, is located 1/8 mile east of the facility, and is used primarily for industrial purposes. Facility personnel stated that all surface-water drainage, industrial waste water, and floor drains are routed to the sanitary sewer.

2.6.3 Geology and Soils

The soil types over much of Cook County have not been mapped in detail by the U.S. Department of Agriculture (USEPA, 1979) because of obscuring urban land use. However, their report contains a regional soil map that classifies the soil near Bodine Electric as level, poorly drained silty and clayey soils formed in glacial lake sediment (USDA, 1979).

The sediment and rock occurrence expected at the facility is an unknown thickness of unconsolidated sediments originating from Pleistocene glacial action (ponded-water clays, tills, and outwash) overlying bedrock composed of sedimentary rock units of Paleozoic age. No site-specific information is currently available about the character of either the unconsolidated

materials or the bedrock. However, Berg and Kempton (1988) have used data from the Illinois State Geological Survey's extensive collection of well logs to prepare a series of maps which generally indicate the probable occurrence of sediments and/or bedrock within the interval from the surface to 50 feet in depth. For the area around the Bodine Electric facility, they indicate a probability of a 20-foot deep silty clayey till overlying Silurian dolomite. The bedrock surface is expected between 20 and 50 feet below ground surface.

2.6.4 Ground Water

No site-specific hydrogeologic information is available. Therefore, no statements may be made regarding the depth to the water table, ground-water flow rates or directions, or the arrangement of aquifers and aquitards beneath the site. Well usage in the vicinity is described in Section 2.7.

In northeastern Illinois, ground water for public and industrial use is or has been obtained from four different water-producing zones within the geologic succession. The first zone is the ground water occurring within the unconsolidated Pleistocene sediments. The second zone is an interval of shallow bedrock units, which are generally in contact with the Pleistocene sediments. The third and fourth zones are two deeper intervals of water-producing rock units. Hughes and others (1966) discuss the character of each of the four zones, their hydrologic properties and the location of their recharge zones. Virtually all wells producing municipal or industrial water within the Greater Chicago area pump from one or both of the deep bedrock aquifer zones (Bergstrom and others, 1955).

The shallow bedrock zone in northeastern Illinois underlies the glacial sediments and is mainly comprised of Silurian dolomite. The upper boundary of this zone is the erosional surface of the bedrock, which is commonly obscured by glacial sediments, and the lower boundary is the upper Ordovician Maquoketa Shale. Water produced from the dolomite is obtained from fractures and solution openings (Hughes and others, 1966). The shallow bedrock aquifer zone receives some recharge from precipitation (Hughes and others, 1966).

The deep bedrock aquifer zones include the Cambrian-Ordovician aquifer and the Mt. Simon aquifer (Hughes and others, 1966). The Cambrian-Ordovician aquifer contains two major zones, the Glenwood-St. Peter aquifer and the Ironton-Galesville aquifer. The top of the Cambrian-Ordovician zone is the Galena-Platteville Dolomite. The Glenwood-St. Peter aquifer is

widely utilized where water requirements are less than 200 gallons per minute (gpm). This unit has a hydraulic conductivity between 9 and 15 gallons per day per square foot (gpd/sq.ft.). The Ironton-Galesville Sandstone aquifer has a hydraulic conductivity between 30 and 40 gpd/sq.ft. Recharge to the deep bedrock aquifers is mostly from west and north of the six county metropolitan area, where rocks crop out at the surface or lie immediately below the glacial drift. Minor recharge occurs as leakage through the shallow bedrock aquifer system.

The Mt. Simon aquifer is bounded above by the relatively impermeable shales and siltstones of the upper and middle Eau Claire Formation and below by pre-Cambrian basement rock. The average hydraulic conductivity of this aquifer is 16 gpd/sq.ft. (Hughes and others, 1966) and recharge is largely from the outcrop region of Cambrian rocks in south-central Wisconsin (Willman, 1971).

2.7 RECEPTORS

The Bodine Electric facility occupies 11 acres in an industrial and residential area in Chicago, Illinois. Chicago has a population of about 2,800,000.

The facility is bordered on the north by a park and a parking lot, on the south by WGN television studios, on the east by residences and a parking lot, and on the west by an industrial park. The nearest school, Lane Technical High School, is located about 1/4 mile south of the facility. There is fencing at the northern side of the building, but it does not surround the property nor prevent access onto the property. Facility access is controlled by a security guard during the second and third shifts.

The nearest surface-water body, the North Branch of the Chicago River, is 1/8 mile west of the facility and is used primarily for industrial purposes. There are no other significant surface-water bodies within 2 miles of the facility.

Ground water is not used as a drinking-water supply. The location of the nearest drinking-water well is unknown. Lake Michigan, located approximately 4 miles east of the facility, is the drinking-water source for Chicago. Sensitive environments are not located onsite. The nearest wetland is located 1/8 mile west of the facility.

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the 10 SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of documented releases, and BVWST observations.

SWMU 1

Dross Satellite Accumulation Area

Unit Description:

The Dross Satellite Accumulation Area is located indoors, above ground, in the die casting area, at the northeastern part of the facility. The die casting area is an approximately 75-foot wide by 200-foot long room with brick walls and a concrete floor. This unit is used to accumulate aluminum and lead dross (D008). There is a 2-foot-square, 6- to 8-inch deep drop pan for each of the five die cast machines in this area. Waste dross falls into the drop pans, cools, and is emptied or shoveled into either 55-gallon drums or 4-cubic-foot steel containers. The drums and steel containers always remain on the concrete floor near the die cast machines at the far northern end of the room until they are moved to be picked up from the Loading Dock (SWMU 10). The drums and containers remain open and are not labeled. No floor drains are in the area. (See Photograph No 1).

Date of Startup:

The startup date for this SWMU is unknown but assumed to be when facility operations began in 1957.

Date of Closure:

This unit is active.

Wastes Managed:

This unit manages aluminum and lead dross (D008). When the drums or steel containers are full, or before 90 days, they are put on an approximately 5-inch high metal skid, lifted by a forklift machine, and transported to the Loading Dock (SWMU 10) for pick up and recycling by Scimitar in Highland Park, Illinois.

Storage Area (SWMU 9). When this waste is ready to be picked up for recycling by Safety Kleen in Chicago, Illinois, it is moved to the Loading Dock (SWMU 10).

Release Controls: Absorbent materials, pads, and clay are kept indoors between this area and the Dross Satellite Accumulation Area (SWMU 1) and can be used if a spill occurs.

History of Documented Releases: No releases from this SWMU are documented.

Observations: This unit contained one drum that was in good condition, showing no visible signs of cracks or leakage. No cracks were visible on the concrete floor. No evidence of release was noted.

SWMU 3 Olson Satellite Accumulation Area

Unit Description: The Olson Satellite Accumulate Area is located indoors, above ground, in the grinding department at the south central end of the machining area. This area consists of a 55-gallon drum. Paper filters saturated with nonhazardous water-based coolant are generated in an approximately 8-foot high by 7-foot long by 5-foot wide Olson unit. The paper filters are cut, crushed, and thrown into the satellite drum before being transported to the Loading Dock (SWMU 10). The drum remains open on the concrete floor and is not labeled. A floor drain lies next to this unit. (See Photograph No. 3).

Date of Startup: This unit began operation in 1960.

Date of Closure: This unit is active.

Wastes Managed: This unit manages paper filter saturated with nonhazardous water-based coolant which is cut, crushed, and thrown into the satellite

Release Controls: Absorbent materials, pads, and clay are kept indoors near this area and can be used if a spill occurs.

Observations: This unit contained one drum that was in good condition, showing no visible signs of cracks or leaks. No cracks were visible on the concrete floor. No evidence of release was noted.

Hyde Satellite Accumulation Area

Wastes Managed: The Hyde unit manages waste oil (D001) which is extracted directly into a satellite drum. When full, or before 90 days, the drum is put

Release Controls: Absorbent materials, pads, and clay are kept indoors near this area and can be used if a spill occurs.

Observations: This unit contained a drum that was in good condition, showing no visible signs of cracks or leakage. No cracks were visible on the concrete floor. No evidence of release was noted.

Unit Description: The Screw Machine Satellite Accumulation Area is located indoors, above ground, adjacent to the Loading Dock (SWMU 10), at the southeastern part of the facility. This area consists of a 55-gallon steel drum. Nonhazardous oil-coated scrap metal from machining operations is put into a screw machine chip spinner to separate the oil from the metal. About 90 percent of the oil is removed from the metal. The oil is retained and reused onsite. The scrap metal is placed in the satellite drum, which remains on the concrete floor near the chip spinner. When full, the drums are moved to the Loading Dock and dumped into the Scrap Metal Dumpster (SWMU 6). (Because this SWMU was not identified until after the VSI, there is no photograph of this SWMU).

Date of Closure:	This unit is active.
Wastes Managed:	This unit manages nonhazardous oil-coated scrap metal. Facility personnel explained that about 90 percent of the oil on scrap metal is removed in the screw machine chip spinner. When full, or before 90 days, drums are put on an approximately 5-inch high metal skid, lifted by a forklift machine, and transported to the Scrap Metal Dumpster (SWMU 6) for pick up and recycling by Midwest Metals in Chicago, Illinois.
Release Controls:	Absorbent materials, pads, and clay are kept indoors near this area and can be used if a spill occurs.
History of Documented Releases:	No releases from this SWMU are documented.
Observations:	This unit was in good condition, with no visible signs of cracking or leakage. No cracks were visible on or around the concrete floor. No evidence of release was noted.
SWMU 6	Scrap Metal Dumpster
Unit Description:	The Scrap Metal Dumpster is located indoors, above ground, against the eastern wall of the Loading Dock (SWMU 10) at the southeastern corner of the facility. This unit is an approximately 20-cubic-yard metal structure. Drums of nonhazardous oil-coated scrap metal from the Screw Machine Satellite Accumulation Area (SWMU 5) are brought by forklift to the Loading Dock (SWMU 10) and emptied into the dumpster. The dumpster remains open on the concrete floor until it is hauled off by Midwest Metals for recycling. (See Photograph No 5).
Date of Startup:	The startup date for this unit is unknown but assumed to be when plant operations began in 1957.

Date of Closure:	The unit is active.
Wastes Managed:	This unit manages nonhazardous oil-coated scrap metal from various machining operations at the plant. Facility personnel explained that about 90 percent of the oil on scrap metal is removed in the screw machine chip spinner in the Screw Machine Satellite Accumulation Area (SWMU 5). Midwest Metals in Chicago, Illinois picks up and recycles the oil-coated scrap metal.
Release Controls:	Release controls for this unit include absorbent materials under a drain which is indoors, perpendicular to the dumpster running east to west along the northern wall of the Loading Dock. There is also an 8-inch high concrete barrier around the drain to prevent any leakage that may occur from reaching the floor drain.
History of Documented Releases:	In May 1991, oil containing traces of lead leaked into the floor drain, discharging to the sanitary sewer. The water in the drain was sampled and the incident was absolved by the Metropolitan Water Reclamation District of Greater Chicago (MWRD, 1992).
Observations:	This unit contained oil-coated scrap metal. The unit was in good condition, with no visible signs of cracking or leakage. No cracks were visible on the concrete floor. No evidence of release was noted.

SWMU 7

Varnish Satellite Accumulation Area

Unit Description:	The Varnish Satellite Accumulation Area is located indoors, above ground, just west of the machining area at the middle section of the facility. This unit is located in a room that is approximately 8-square-feet with brick walls and a concrete floor. There is a steel door on the southern wall which is kept closed. Varnishing waste (D001) is accumulated in this unit before it is moved to the Drum
-------------------	--

Storage Area (SWMU 9). Varnishing waste is put into 55-gallon steel drums placed along the western wall of the room. The waste is poured through funnels inserted in the drum openings. The drums are closed, unless a funnel is inserted in their openings, and they remain on the concrete floor until they are moved. Drums are labeled with contents and hazard information. (See Photograph No. 6).

Date of Startup:	The startup date for this unit is unknown but assumed to be when facility operations began in 1957.
Date of Closure:	This unit is active.
Wastes Managed:	This unit manages varnishing waste (D001). When a drum is full, or before 90 days, it is put on an approximately 5-inch high metal skid, lifted by a forklift machine, and transported to the Drum Storage Area (SWMU 9). When this waste is ready to be picked up for recycling by Safety Kleen in Chicago, Illinois, it is moved to the Loading Dock (SWMU 10).
Release Controls:	Absorbent materials, pads, and clay are kept indoors at the northeastern part of the facility and can be used to contain wastes if a spill occurs.
History of Documented Releases:	No releases from this SWMU are documented.
Observations:	This unit contained two drums that were in good condition, showing no visible signs of cracks or leakage. No cracks were visible on the concrete floor. No evidence of release was noted.

SWMU 8**Incinerator****Unit Description:**

The Incinerator is located in the north central portion of the main building, between the assembly department and machining area. This unit is a Goder Model No. 28-N, class 3, with a multiple chamber, single burner, controlled by an afterburner and wet scrubber. Both burners are rated at 800,000 British Thermal Units (BTU). This unit is an approximately 15-foot high by 10-foot long by 8-foot wide steel structure. This unit operates three hours per day, five days per week and burns 200 pounds of nonhazardous general office waste per hour. This unit lies on a concrete floor. (See Photograph No. 6).

Date of Startup:

The startup date for this unit is unknown but assumed to be when facility operations began in 1957.

Date of Closure:

This unit is active.

Wastes Managed:

This unit incinerates nonhazardous general office wastes, including paper, wood, rags, and miscellaneous office refuse.

Release Controls:

This unit has a wet scrubber to minimize exhaust emissions.

History of Documented Releases:

No releases from this SWMU have been documented.

Observations:

This unit was not in operation during the VSI. This unit showed no visible signs of cracking or releases. No cracks were visible on the concrete floor. No evidence of release was noted.

Release Controls:	Absorbent materials, pads, and clay are kept nearby and can be used to contain wastes if a spill occurs.		
History of Documented Releases:	No releases from this SWMU are documented.		
Observations:	This unit had approximately 25 drums of waste during the VSI. The drums were sealed and in good condition with no evidence of leakage. No cracks were visible on or around the concrete floor. No evidence of release was noted.		
<table border="0" style="width: 100%;"> <tr> <td style="width: 30%; vertical-align: top;">SWMU 10</td> <td style="vertical-align: top;">Loading Dock</td> </tr> </table>		SWMU 10	Loading Dock
SWMU 10	Loading Dock		
Unit Description:	The Loading Dock is located indoors, above ground, at the far southeastern corner of the facility. The floor is concrete and brick walls surround the northern, eastern, and western sides; the southern side is open. This unit is used to unload raw materials being brought into the facility. It is also used to temporarily store wastes just before they are picked up and taken away from the facility. Initially, most wastes are stored in the Drum Storage Area (SWMU 9) then moved to the Loading Dock for pick up.		
Date of Startup:	The startup date for this unit is unknown but assumed to be when plant operations began in 1957.		
Date of Closure:	This unit is active.		
Wastes Managed:	This unit manages aluminum and lead dross (D008), rust inhibitor (D001), nonhazardous water-based coolant, waste oil (D001), paint sludge (F005), varnishing waste (D001), spent mineral spirits (D001), spent methylene chloride (F001), and spent trichloroethylene (F001). All wastes generated at the facility are moved to the loading dock for pick up.		

Release Controls:

Release controls for this unit include absorbent materials under a drain which is perpendicular to the Scrap Metal Dumpster (SWMU 6) running east to west along the northern wall. There is also an eight-inch high concrete barrier around the drain to prevent any spills that may occur from reaching the floor drain.

History of Documented Releases:

No releases from this SWMU have been documented.

Observations:

No cracks were visible on or around the concrete floor. No evidence of release was noted.

4.0 AREAS OF CONCERN

BVWST did not identify any AOCs during the PA/VSI.

5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified 10 SWMUs at the Bodine Electric facility. Background information on the facility's location, operations, waste generating processes, history of documented release, regulatory history, environmental setting, and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, history of documented releases, and observed condition, is presented in Section 3.0. Following are BVWST's conclusions and recommendations for each SWMU. Table 3 summarizes the SWMUs at the Bodine Electric facility and recommended further actions.

SWMU 1 Dross Satellite Accumulation Area

Conclusions: This unit is indoors with no cracks visible on drums or on the concrete floor. Absorbent materials are stored nearby in the event of a spill. This unit does not store wastes for more than 90 days. This unit has a low potential for release to ground water, surface water, air, and on-site soils.

Recommendations: BVWST recommends no further action for this SWMU.

SWMU 2 Rust Inhibitor Satellite Accumulation Area

Conclusions: This unit is indoors with no leaks visible on drums or cracks on the concrete floor. Absorbent materials are stored nearby in the event of a spill. This unit does not store wastes for more than 90 days. This unit has a low potential for release to the ground water, surface water, air, and on-site soils.

Recommendations: BVWST recommends no further action for this SWMU.

SWMU 3 Olson Satellite Accumulation Area

Conclusions: This unit is indoors with no leaks visible on drums or cracks on the concrete floor. This unit does not store wastes for more than 90 days.

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DATE 3/8/01
RIN # 0158-01
INITIALS kg

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DATE 3/8/01
BIN # 075801
INITIALS *lac*

ENFORCEMENT
CONFIDENTIAL

Absorbent materials are stored nearby in the event of a spill. This unit has a low potential for release to the ground water, surface water, air, and on-site soils.

Recommendations: BVWST recommends no further action for this SWMU.

SWMU 4 Hyde Satellite Accumulation Area

Conclusions: This unit is indoors with no leaks visible on drums or cracks on the concrete floor. This unit does not store wastes for more than 90 days. Absorbent materials are stored nearby in the event of a spill. This unit has a low potential for release to the ground water, surface water, air, and on-site soils.

Recommendations: BVWST recommends no further action for this SWMU.

SWMU 5 Screw Machine Satellite Accumulation Area

Conclusions: This unit is indoors with no leaks visible on drums or cracks on the concrete floor. This unit does not store wastes for more than 90 days. Absorbent materials are stored nearby in the event of a spill. This unit has a low potential for release to the ground water, surface water, air, and on-site soils.

Recommendations: BVWST recommends no further action for this SWMU.

SWMU 6 Scrap Metal Dumpster

Conclusions: This unit is indoors with no leaks on the concrete floor. In May 1991, oil containing traces of lead leaked into the floor drain, discharging to the sanitary sewer. The water in the drain was sampled and the incident was absolved by the Metropolitan Water Reclamation District of Greater

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DATE: 3/8/01
PIN # 0158-01
INITIALS: [signature]

Chicago (MWRD, 1992). An 8-inch high concrete barrier was built around the drain to prevent any leakage that may occur from reaching the floor drain. Also, absorbent materials are stored nearby. This unit does not store wastes for more than 90 days. This unit has a low potential for release to the ground water, surface water, air, and on-site soils.

Recommendations: BVWST recommends no further action for this SWMU.

SWMU 7 Varnish Satellite Accumulation Area

Conclusions: This unit is indoors with no cracks visible on drums or on the concrete floor. This unit does not store wastes for more than 90 days. Absorbent materials are stored nearby in the event of a spill. This unit has a low potential for release to the ground water, surface water, air, and on-site soils.

Recommendations: BVWST recommends no further action for this SWMU.

SWMU 8 Incinerator

Conclusions: This permitted unit is indoors with no cracks visible on the concrete floor. This unit has a low potential for release to the ground water, surface water, air, and on-site soils.

Recommendations: BVWST recommends no further action for this SWMU.

SWMU 9 Drum Storage Area

Conclusions: This unit is indoors with no leaks visible on drums or cracks on the concrete floor. This unit does not store wastes for more than 90 days. Absorbent materials are stored nearby in the event of a spill. This unit has

SWMU 9**Drum Storage Area****Unit Description:**

The Drum Storage Area is located indoors, above ground, west of the Loading Dock (SWMU 10), at the southeastern part of the facility. This SWMU consists of a main area with an adjacent hallway. The main area is an approximately 25-foot by 50-foot room opening into the adjacent hallway measuring approximately 30 feet by 10 feet. The entire Drum Storage Area has a concrete floor and is used to store all wastes generated at the facility except aluminum and lead dross, scrap metal, and general office wastes. It also stores raw material the facility receives. All wastes are stored in 55-gallon drums. A sign on the eastern wall of the adjacent hallway designates waste oil drums. There is no designated place for the other waste groups. Waste drums are labeled according to the wastes they contain and are stored on the concrete floor or on steel racks, according to available space. The main area has floor drains in the center and southwestern corner, which lead to the sanitary sewer system. Waste drums are moved to the Loading Dock by forklift when they are to be picked up. (See Photograph Nos. 8 and 9).

Date of Startup:

The startup date for this unit is unknown but assumed to be when facility operations began in 1957.

Date of Closure:

This unit is RCRA closed. RCRA closure occurred in 1986 and was approved by IEPA in 1987. This unit is now used to store hazardous waste for less than 90 days.

Wastes Managed:

This unit manages rust inhibitor (D001), waste oil (D001), paint sludge (F005), varnishing waste (D001), spent mineral spirits (D001), spent methylene chloride (F001), and spent trichloroethylene (F001). All drums are moved to the Loading Dock (SWMU 10) by forklift for pick and recycling by Safety Kleen in Chicago, Illinois.

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DATE 3/8/01

RIN # 0158-01

INITIALS kg

ENFORCEMENT
CONFIDENTIAL

a low potential for release to the ground water, surface water, air, and on-site soils.

Recommendations: BVWST recommends no further action for this SWMU.

SWMU 10

Loading Dock

Conclusions: This unit is indoors with no cracks visible on the concrete floor. This unit does not store wastes for more than 90 days. Absorbent materials are stored nearby in the event of a spill. This unit has a low potential for release to the ground water, surface water, air, and on-site soils.

Recommendations: BVWST recommends no further action for this SWMU.

RELEASED

DATE 4/8/01

RIN # 6158/01

INITIALS JH

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TABLE 3

SWMU SUMMARY

	SWMU	Dates of Operation	Evidence of Release	Recommended Further Action
1.	Dross Satellite Accumulation Area	1957-Present	None	None
2.	Rust Inhibitor Satellite Accumulation Area	1970-Present	None	None
3.	Olson Satellite Accumulation Area	1960-Present	None	None
4.	Hyde Satellite Accumulation Area	1986-Present	None	None
5.	Screw Machine Satellite Accumulation Area	1957-Present	None	None
6.	Scrap Metal Dumpster	1957-Present	None	None
7.	Varnish Satellite Accumulation Area	1957-Present	None	None
8.	Incinerator	1957-Present	None	None
9.	Drum Storage Area	1957-Present	None	None
10.	Loading Dock	1957-Present	None	None

REFERENCES

- Berg, R.C., J.P. Kempton, and K. Cartwright, 1984. "Potential for Contamination of Shallow Aquifers in Illinois", Illinois State Geological Survey, Circular 532.
- Berg, R.C. and J.P. Kempton, 1988. "Stack-Unit Mapping of Geologic Materials in Illinois to a Depth of 15 Meters", Illinois State Geological Survey, Circular 542.
- Bergstrom, R.E., J.W. Foster, L.F. Skelknegg, and W.A. Pryor, 1955. "Groundwater Possibilities in Northeastern Illinois", Illinois State Geological Survey, Circular 198.
- Bodine Electric Company, 1980a. Notification of Hazardous Waste Activity, August 15.
- Bodine, 1980b. RCRA Part A Permit Application, November 17.
- Bodine, 1992. Letter from Duane Pecci, Bodine Electric Company, to BVWST, April 14.
- Federal Emergency Management Agency (FEMA), 1981. Flood Insurance Rate Map, June 1.
- Gabriel and Associates, 1986. Plant Layout for Bodine Electric Co., October 2.
- Hughes, G.E., P. Kraatz, and A. Landon, 1966. "Bedrock Aquifers of Northeastern Illinois", Illinois State Geological Survey, Circular 406.
- Illinois Environmental Protection Agency (IEPA), 1973. IEPA interoffice correspondence from Cezary Krzymowski to Miles Zamco, Surveillance Manager dated February 28.
- IEPA, Division of Land Pollution Control, 1982, 1985a. Summary of RCRA compliance inspections in October 19, July 18.
- IEPA, Division of Land Pollution Control, 1985b, 1987, 1991. Operating permits, November 25, October 6, May 17.
- IEPA, Division of Land Pollution Control, 1985c. Letter from IEPA to Bodine Electric on September 18.
- IEPA, Division of Land Pollution Control, 1986. Letter from Lawrence Eastep of IEPA to Bodine Electric on October 5.
- Illinois State Water Survey, 1992. Telephone call from Illinois State Water Survey on April 29, 1992.
- Metropolitan Water Reclamation District of Greater Chicago (MWRD), 1992. Letter to Bodine Electric Company, January 13.
- National Weather Bureau (NWB), 1991. O'Hare National Airport Data.
- National Wetlands Inventory (NWI), 1983. Wetlands in Dyer Section, April.
- U.S. Department of Agriculture (USDA), 1979. "Soil Survey of DuPage and Cook Counties".
- Willman, H.B., 1971. "Summary of the Geology of the Chicago Area", Illinois State Geological Survey, Circular 460.

ATTACHMENT A

EPA PRELIMINARY ASSESSMENT FORM 2070-12



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE
IL

02 SITE NUMBER
IL D 005 069 224

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site) Bodine Electric Company	02 STREET, ROUTE NO. OR SPECIFIC LOCATION IDENTIFIER 2500 West Bradley Place				
03 CITY Chicago	04 STATE IL	05 ZIP CODE 60618	06 COUNTY Cook	07 COUNTY CODE	08 CONG DIST
09 COORDINATES: LATITUDE 41° 53' 45" .N		LONGITUDE 87° 41' 2" .W			
10 DIRECTIONS TO SITE (Starting from nearest public road) From Chicago Loop (Downtown): Take the Kennedy north to Western, go north on Western, go about 1/2 mile and turn left on Addison, turn right on Campbell, go a couple blocks down turn right into the parking lot, which is across the street					

III. RESPONSIBLE PARTIES

01 OWNER (If known) Bodine Electric Company	02 STREET (Business, mailing, residential) 2500 West Bradley Place				
03 CITY Chicago	04 STATE IL	05 ZIP CODE 60618	06 TELEPHONE NUMBER (312) 478-3515		
07 OPERATOR (If known and different from owner) Mr. Duane R. Pecci, Safety Administrator	08 STREET (Business, mailing, residential) 2500 West Bradley Place				
09 CITY Chicago	10 STATE IL	11 ZIP CODE 60618	12 TELEPHONE NUMBER (312) 478-3515		
13 TYPE OF OWNERSHIP (Check one) <input checked="" type="checkbox"/> A. PRIVATE <input type="checkbox"/> B. FEDERAL: _____ (Agency Name) <input type="checkbox"/> C. STATE <input type="checkbox"/> D. COUNTY <input type="checkbox"/> E. MUNICIPAL <input type="checkbox"/> F. OTHER _____ (Specify) <input type="checkbox"/> G. UNKNOWN					
14. OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply) <input type="checkbox"/> A. RCRA 3010 DATE RECEIVED: 8 / 15 / 80 <input type="checkbox"/> B. UNCONTROLLED WASTE SITE (CERCLA 103 c) DATE RECEIVED: ____ / ____ / ____ <input type="checkbox"/> C. NONE MONTH DAY YEAR MONTH DAY YEAR					

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION <input checked="" type="checkbox"/> YES DATE 02/10/92 <input type="checkbox"/> NO		BY (Check all that apply) <input type="checkbox"/> A. EPA <input type="checkbox"/> B. EPA CONTRACTOR <input type="checkbox"/> C. STATE <input type="checkbox"/> D. OTHER CONTRACTOR <input type="checkbox"/> E. LOCAL HEALTH OFFICIAL <input type="checkbox"/> F. OTHER: _____ (Specify) CONTRACTOR NAME(S): B&V Waste Science and Technology Corp.	
02 SITE STATUS (Check one) <input checked="" type="checkbox"/> A. ACTIVE <input type="checkbox"/> B. INACTIVE <input type="checkbox"/> C. UNKNOWN	03 YEARS OF OPERATION 1957 Present <input type="checkbox"/> UNKNOWN BEGINNING YEAR ENDING YEAR		
04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED Liquid chemicals, oils, and solid metals.			
05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION A low potential release or hazard to the environment exists at this facility.			

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents.) <input type="checkbox"/> A. HIGH (Inspection required promptly) <input type="checkbox"/> B. MEDIUM (Inspection required) <input type="checkbox"/> C. LOW (Inspect on time-available basis) <input type="checkbox"/> D. NONE (No further action needed; complete current disposition form)			
--	--	--	--

VI. INFORMATION AVAILABLE FROM

01 CONTACT Kevin Pierard	02 OF (Agency/Organization) U.S. EPA		03 TELEPHONE NUMBER (312) 886-4448	
04 PERSON RESPONSIBLE FOR ASSESSMENT Tim Moody	05 AGENCY	06 ORGANIZATION BVWST	07 TELEPHONE NUMBER (312) 346-3775	08 DATE June 17, 1992 Month/Day/Year

ATTACHMENT B

VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

VISUAL SITE INSPECTION SUMMARY

Bodine Electric
Chicago, Illinois
ILD 005 069 224

Date: February 10, 1992

Facility Representatives: Duane Pecci, Employee Training

Inspection Team: Pete Wolsko, B&V Waste Science and Technology Corp.
Tim Moody, B&V Waste Science and Technology Corp.

Photographer: Pete Wolsko

Weather Conditions: Calm, overcast, temperature about 35°F.

Summary of Activities: The visual site inspection began at 9:00 a.m. with an introductory meeting. The inspection team discussed the purpose of the VSI and the agenda for the visit. Bodine Electric's past and present operations, solid waste management units, and release history were discussed. Most of the information was exchanged on a question-and-answer basis.

The VSI tour began at 10:45 a.m. All SWMUs were viewed and photographed during the VSI. All SWMUs appeared to be in good condition with no cracks evident in the concrete floor below. No evidence of release to any media was noted.

The tour concluded at 12:30 p.m., after which the inspection team held an exit meeting with the facility representative. The VSI was completed and the inspection team left the facility at 2:00 p.m.



Photograph No. 1
 Orientation: North
 Description: Dross Satellite Accumulation Area

Location: SWMU 1
 Date: April 30, 1992



Photograph No. 2
 Orientation: Northeast
 Description: Rust-Inhibitor Satellite Accumulation Area

Location: SWMU 2
 Date: April 30, 1992



Photograph No. 3
 Orientation: South
 Description: Olson Satellite Accumulation Area

Location: SWMU 3
 Date: April 30, 1992



Photograph No. 4
 Orientation: West
 Description: Hyde Satellite Accumulation Area

Location: SWMU 3
 Date: April 30, 1992



Photograph No. 5
Orientation: Southeast
Description: Scrap Metal Dumpster

Location: SWMU 4
Date: April 30, 1992



Photograph No. 6
Orientation: Northwest
Description: Varnish Satellite Accumulation Area

Location: SWMU 5
Date: April 30, 1992



Photograph No. 7
 Orientation: Southwest
 Description: Nonhazardous Waste Incinerator

Location: SWMU 6
 Date: April 30, 1992



Photograph No. 8
 Orientation: West
 Description: Main Area of the Drum Storage Area

Location: SWMU 7
 Date: April 30, 1992



Photograph No. 9
Orientation: South
Description: Adjacent Hallway of the Drum Storage Area

Location: SWMU 7
Date: April 30, 1992

ATTACHMENT C

VISUAL SITE INSPECTION FIELD NOTES

Pete Walsh

1

Pete Walsh + Tim Moody
arrive at BODINE Elect. Co.
and meet with Duane Ricci.
He had us talk quickly with
Dave McClellan! Dir of hum.
resources

We meet with Duane in room
to discuss details.
He has only been with co. for 1 1/2
yrs. My. Elect. machs.

2 areas - component mfg fac.
machining, die casting
paint facility (spray)
parts washing system + TCE wash.
Phosphate Jumble

③ component assembly
dry prep ← epoxy coating machines
2 processes (running, 1st)
I don't get (both permitted)
- varnishing thin section
coil

- portable part washers all over

Pete Walsh

2

The plant Salky Clean comes every 2
weeks.

All works are processed by Salky Clean
except for 1 last load of paint to
Solvent Systems

This year has been a slow gen. test
less waste this year than this.

No alkaline remove this year.

Dye casting - purchase alum. + zinc ingots
melt then down in pot. Used to process
structural components that don't move
grate & Aluminum Dross, which
is the residue which is left over
Scrap off + store in drums?

Cleaning - coating / part washer
conveyed from in buckets through stages

Pete Wells

3

from parts washes - do better discharge

① area of metal dr. - to sewer
do parts wash discharge
every quarter they discharge this
and ammonia
this to Metrop.
Wash District.

Dev 20.

2 parts wash area is Tri Chlor.
not dumped, stored in drums

3-4 times a year emptied and
put in drums and moved to
east shipping area.

It's all little parts washes
in machining + Assembly area.

Only one TCE + Phosphat machine

Pete Wells

4

Machining - take castings + move to machining

oil from this area is used then
recycled - all internal oil usage.

Machining coolant - have a recycling
system for coolant @ Hyde + Oshol
recycling system - very little wash
generated from this recycling.

Metal dump str gets wash from machining
spin the wash metal around to
separate the oil from metal
Centrifuge - oil from metal, metal
to recycle, oil to drums.

Paint room - Priming + Painting

dye - wash - paint

Prime - dry - paint - dry.

washes in drums - Thin with thinner

Pat W. 8

5

or replace so it does not become
non-processable
11 drums or 1/4 yr

all drums get stored in Waste St.

Paint booths have stock permits

Machining area has a couple of
air sticks.

5 air permits

Incinerator - paper, cups, lunchroom
everything? - Both Mitchell
no indus. work.

lathe w/ dust collector
5 machines not permitted the
(last spring), but they are now.
Approved late Dec, Jan
lathe w/ dust collector

Pat W. 8

6

Component Assembly

Rotor coating process - old process

New skt coating process - not yet
(permitted)

Spray paint paint.
epoxy paint. 2

coat all skt (no mount)

both have air permits -

check on waste from scrubbers lab.

Varnish - 2 processes

dip tank process + trickle machine

Wash, but how?

- brush on epoxy - check on how it

is disposed of. hand operator
probably gets in with sorting else

Pete Wells

7

Assembly is assembly area

Soldering ops are in winding area
Small operations.

No stacks in assembly area
grease for machines - grease pit.
(dorms)

525 employees

paint + making area - 3 shifts
+ dye casts
other areas - 1 shift.

yard for 2nd + 3rd shifts
not on 1st
trace on north to close off.
no surveying

Pete Wells

8

South WGN televis. stacks
north - big park + parking lot
west - industrial park - ~~mostly~~
east - parking lot.

Built in 1956-7

Prior, Bodine family had golf course.
not much has changed. here

Always had dye casting, pc
all pretty much the same
large quarry brack

AST-5 getting tested + removed
third year.

No release

NORBC - tenant in building
→ not spec

late work

9

Photo #1 of final hr. work stage

Photo #2 of 1st work stage area.

Photo #3 east to TCE work.

met Bob Mitchell

Photo #4 5 stage parts wash.

priming + painting area water scrubbed
paint sledge periodically cleaned
and damaged.

Photo #5 paint area + primer.

Dross skimmed off daily + collected
in drum to cool off
then when full move to ash +
more to storage area.

3 Dross machines - 3 drums.

late work

10

Photo #6 Hyde recycle.

Photo #7 Olsen recycle

Wash oil from machines recycled

Centrifuge oil goes back to machine

Not hazardous from epoxy work
every 2-3 years clean up to photo bag

periodically clean varnish dip tank.

Photo #8 Varnish dip tank.

- not much wash - change filter 1/yr.

- clean out 1/yr.

Photo #9 31-Glume Primer for Varnish
Solvent

Styne Manna for plastic dip coating

Take Wash

Plots # 10

10-15 Safety bel. small
parts washers.

370,000 sq ft total

Area Gen. Syph

Hitchhike Chloride

net to epoxy washer

→ Clean starters

→ Cleaning done once or twice a year.
→ empty + move

→ Rust inhibitor middle drum
→ in the 5-stage washer.

TCE cleaning system
big tank

→ removed 3-4 times/yr.

11

Take Wash

12

Plot # 11 TCE tank cleaning system
Down Storage Area.



217/782-6762

Refer to: 0316060003 -- Cook County
Chicago/Bodine Electric Co.
ILD005069224
RCRA General

October 10, 1986

Karl E. Bremer, Chief
Technical Program Section
U.S. Environmental Protection Agency
Region V
230 South Dearborn
Chicago, Illinois 60604

RECEIVED

OCT 21 1986

U.S. EPA, REGION V

RECEIVED
OCT 14 1986
SOLID WASTE DIVISION
U.S. EPA, REGION V

Dear Mr. Bremer:

Enclosed you will find the following:

1. The Initial Screening for Environmental Significance form for the above referenced facility.
2. A copy of the Certification Regarding Potential Releases from Solid Waste Management Units for the above referenced facility and/or the reply the Agency received in response to our request for information regarding the above.

The following form(s) were not on file at the IEPA for this facility:

3. Notification of Hazardous Waste Site (EPA Form 8900-1).
4. Preliminary Assessment (EPA Form 2070-12).

Based upon a review of the information available on the above referenced facility, the Agency has determined that this facility is not environmentally significant and that a Facility Management Plan should not be prepared. Please let us know if you do not agree with this determination.

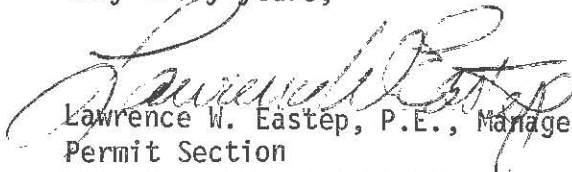
AB



Page 2

If you have any questions regarding this initial screening, please contact Jeanette Virgilio of my staff at 217/782-9875.

Very truly yours,


Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LWE:JV:bjh/0220g/20,21

Enclosure

cc: Division File
USEPA Region V -- Ann Budich
FOS Northern Region

CERTIFICATION REGARDING POTENTIAL RELEASES FROM
SOLID WASTE MANAGEMENT UNITS

FACILITY NAME: BODINE ELECTRIC COMPANY

EPA I.D. NUMBER: ILD005069224

LOCATION CITY: 2500 W. BRADLEY PL. CHICAGO

STATE: ILLINOIS

1. Are there any of the following solid waste management units (existing or closed) at your facility? NOTE - DO NOT INCLUDE HAZARDOUS WASTE UNITS CURRENTLY SHOWN IN YOUR PART A APPLICATION

	YES	NO
• Landfill	<u> </u>	<u>X</u>
• Surface Impoundment	<u> </u>	<u>X</u>
• Land Farm	<u> </u>	<u>X</u>
• Waste Pile	<u> </u>	<u>X</u>
• Incinerator	<u> </u>	<u>X</u>
• Storage Tank (Above Ground)	<u> </u>	<u>X</u>
• Storage Tank (Underground)	<u> </u>	<u>X</u>
• Container Storage Area	<u> </u>	<u>X</u>
• Injection Wells	<u> </u>	<u>X</u>
• Wastewater Treatment Units	<u> </u>	<u>X</u>
• Transfer Stations	<u> </u>	<u>X</u>
• Waste Recycling Operations	<u> </u>	<u>X</u>
• Waste Treatment, Detoxification	<u> </u>	<u>X</u>
• Other <u> </u>	<u> </u>	<u> </u>

2. If there are "Yes" answers to any of the items in Number 1 above, please provide a description of the wastes that were stored, treated or disposed of in each unit. In particular, please focus on whether or not the wastes would be considered as hazardous wastes or hazardous constituents under RCRA. Also include any available data on quantities or volume of wastes disposed of and the dates of disposal. Please also provide a description of each unit and include capacity, dimensions and location at facility. Provide a site plan if available.

N/A

NOTE: Hazardous wastes are those identified in 40 CFR 261. Hazardous constituents are those listed in Appendix VIII of 40 CFR Part 261.

3. For the units noted in Number 1 above and also those hazardous waste units in your Part A application, please describe for each unit any data available on any prior or current releases of hazardous wastes or constituents to the environment that may have occurred in the past or may still be occurring.

Please provide the following information

- a. Date of release
- b. Type of waste released
- c. Quantity or volume of waste released
- d. Describe nature of release (i.e., spill, overflow, ruptured pipe or tank, etc.)

N/A

4. In regard to the prior or continuing releases described in Number 3 above, please provide (for each unit) any analytical data that may be available which would describe the nature and extent of environmental contamination that exists as a result of such releases. Please focus on concentrations of hazardous wastes or constituents present in contaminated soil or groundwater.

N/A

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the submittal is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. (42 U.S.C. 6902 et seq. and 40 CFR 270.11(d))

R.G. Howard, Plant Engineer

Typed Name and Title

R.G. Howard

Signature

1-28-86

Date

CERTIFICATION REGARDING POTENTIAL RELEASES FROM
SOLID WASTE MANAGEMENT UNITS
(CLOSURE PLAN REVIEW)

FACILITY NAME: BODINE ELECTRIC COMPANY

EPA I.D. NUMBER: ILD005069224

LOCATION CITY: 2500 W. BRADLEY PL. CHICAGO

STATE: ILLINOIS

1. Are there any of the following solid waste management units (existing or closed) at your facility? NOTE - DO NOT INCLUDE HAZARDOUS WASTES UNITS CURRENTLY SHOWN IN YOUR PART A APPLICATION and in your closure plan.

	YES	NO
• Landfill	<u> </u>	<u>X</u>
• Surface Impoundment	<u> </u>	<u>X</u>
• Land Farm	<u> </u>	<u>X</u>
• Waste Pile	<u> </u>	<u>X</u>
• Incinerator	<u> </u>	<u>X</u>
• Storage Tank (Above Ground)	<u> </u>	<u>X</u>
• Storage Tank (Underground)	<u> </u>	<u>X</u>
• Container Storage Area	<u> </u>	<u>X</u>
• Injection Wells	<u> </u>	<u>X</u>
• Wastewater Treatment Units	<u> </u>	<u>X</u>
• Transfer Stations	<u> </u>	<u>X</u>
• Waste Recycling Operations	<u> </u>	<u>X</u>
• Waste Treatment, Detoxification	<u> </u>	<u>X</u>
• Other <u> </u>	<u> </u>	<u>X</u>

2. If there are "Yes" answers to any of the items in Number 1 above, please provide a description of the wastes that were stored, treated or disposed of in each unit. In particular, please focus on whether or not the wastes would be considered as hazardous wastes or hazardous constituents under RCRA. Also include any available data on quantities or volume of wastes disposed on and the dates of disposal. Please also provide a description of each unit and include capacity, dimensions, location at facility, provide a site plan if available.

N/A

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NOTE: Hazardous waste are those identified in 40 CFR 261. Hazardous constituents are those listed in Appendix VIII of 40 CFR Part 261.

3. For the units noted in Number 1 above and also those hazardous waste units in your Part A application and in your closure plan. please describe for each unit any data available on any prior or current releases of hazardous wastes or constituents to the environment that may have occurred in the past or still be occurring.

Please provide the following information

- a. Date of release
- b. Type of waste released .
- c. Quantity or volume of waste released
- d. Describe nature of release (i.e., spill, overflow, ruptured pipe or tank, etc.)

N/A

4. In regard to the prior releases described in Number 3 above, please provide (for each unit) any analytical data that may be available which would describe the nature and extent of environmental contamination that exists as a result of such releases. Please focus on concentrations of hazardous wastes or constituents present in contaminated soil or groundwater.

N/A

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the submittal is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. (42 U.S.C. 6902 et seq. and 40 CFR 270.11(d))

R.G. Howard, Plant Engineer

Typed Name and Title

R.G. Howard

Signature

October 22, 1985

Date

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OCT 25 1985